

**BOULT  
CUMMINGS  
CONNERS  
& BERRY**

REC'D TN  
PLC REGULATORY AUTH.

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414 UNION STREET, SUITE 1600  
POST OFFICE BOX 198062  
NASHVILLE, TENNESSEE 37219

98 APR 3 PM 12 13

Jon E. Hastings  
(615) 252-2306  
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OFFICE OF THE  
EXECUTIVE SECRETARY  
TELEPHONE (615) 244-2582  
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INTERNET WEB <http://www.bccb.com/>

April 3, 1998

K. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

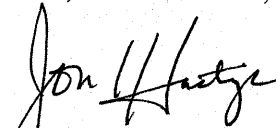
In Re: Bellsouth Telecommunications, Inc.'s Entry into Long Distance Interlata Service  
in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996  
Docket No. 97-00309

Dear David:

Enclosed please find an original and thirteen (13) copies of the supplemental responses of MCI Telecommunications Corporation's and MCI metro Access Transmission Services, Inc.'s to the Consumer Advocate's First Discovery Request dated March 6, 1998. Copies will be served on all parties of record.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

  
Jon E. Hastings

JEH/sja  
Enclosures

## CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been hand delivered or mailed to the following persons on this 3rd day of April, 1998:

Guy M. Hicks  
BellSouth Telecommunications, Inc.  
333 Commerce Street, Suite 2101  
Nashville, TN 37201-3300

Carolyn Tatum Roddy, Esq.  
Sprint Communications  
3100 Cumberland Circle, N0802  
Atlanta, GA 30339

Dennis McNamee, Esquire  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0500

Guilford Thornton, Esq.  
Stokes & Bartholomew  
424 Church Street  
Nashville, TN 37219

Dana Shaffer, Esq.  
NextLink  
105 Molloy Street, #300  
Nashville, TN 37201

D. Billye Sanders, Esq.  
Waller, Lansden, Dortch & Davis  
511 Union Street, #2100  
Nashville, TN 37219-1750

H. LaDon Baltimore, Esq.  
Farrar & Bates  
211 Seventh Ave. No., #320  
Nashville, TN 37219-1823

Henry Walker, Esq.  
Boult, Cummings, Connors & Berry PLC  
414 Union Street, Suite 1600  
Nashville, TN 37219

Charles B. Welch, Esq.  
Farris, Mathews, et al.  
511 Union Street, #2400  
Nashville, TN 37219

Enrico C. Soriano  
Kelley, Drye & Warren  
1200 19th St., NW, #500  
Washington, D.C. 20036

Val Sanford, Esq.  
Gullett, Sanford, et al.  
230 Fourth Ave. N., 3rd Floor  
Nashville, TN 37219-8888

Andrew O. Isar, Esq.  
Telecommunications Resellers Association  
4312 92nd Ave., NW  
Gig Harbor, WA 98335

L. Vincent Williams, Esq.  
Consumer Advocate Division  
426 5th Avenue, N., 2nd Floor  
Nashville, TN 37243

Donald L. Scholes  
Branstetter, Kilgore, et al.  
227 Second Avenue North  
Nashville, TN 37219

Thomas E. Allen  
Intermedia Communications  
3625 Queen Palm Drive  
Tampa, FL 33619

Michael McRae  
TCG  
1133 21st., NW  
Washington, DC 20036

James Lamoureux  
AT&T  
1200 Peachtree St., NE  
Atlanta, GA 30309

---

Jon E. Hastings

**SUPPLEMENTAL RESPONSE TO DATA REQUEST  
NO. 6**





Corporation  
780 Johnson Ferry Road  
Suite 500  
Atlanta, GA 30342  
404 267 5727

January 28, 1998

Ms. Pam Lee  
BellSouth Interconnection services  
1960 West Exchange Place  
Tucker, GA 30084

Re: Late Firm Order Confirmations

Dear Pam:

I am writing concerning the excessive time periods associated with "returned FOCs" after MCI submits an ASR for local service to BellSouth. On average it is taking in excess of seven days for BellSouth to return a FOC.

MCI's expectations are that BellSouth provide Firm Order Confirmations (FOCs) for each order MCI places for local service. The Florida Interconnection Agreement requires BellSouth to provide FOCs for orders submitted electronically within four (4) hours and for manual orders within twenty-four (24) hours (Attachment VIII, section 2.5.3); the Tennessee Interconnection Agreement requires BellSouth to provide MCI with FOCs within twenty-four (24) hours. It is MCI's expectation that BellSouth will comply. Also, because BellSouth uses the same Operations Support Systems throughout its region, if BellSouth is capable of meeting the time frames for Florida, BellSouth therefore should be capable of meeting these time frames region wide.

In analyzing the time it takes BellSouth to provide MCI with an FOC for ASRs submitted for OFF-NET T1's we found that BellSouth exceeded the times specified in the Florida contract by a wide margin. During June through December 1997, MCI submitted 1,037 ASRs for which the average return FOC was seven days.

MON.	JUN	JUL	AUG	SEPT	OCT	NOV	DEC
DAYS	3.75	4.02	5.82	8.52	8.18	8.21	7.12

This delay significantly impedes MCI's ability to turn up customers in a reasonable time period. Therefore, MCI requests that BellSouth adopt the Florida FOC Intervals region wide.

Please respond by February 9, 1998, with the steps you are taking to substantially lessen the time it takes BellSouth to provide MCI with FOCs, and to bring BellSouth into compliance with the Florida and Tennessee contracts.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charlene Keys', written over a horizontal line.

Charlene Keys  
Director of Carrier Markets  
MCI Southern Financial Operations

cc: Wally Schmidt  
Andri Weathersby  
De O'Roark  
Jeremy Marcus

## **SFO-DOC**

---

**From:** Andri weathersby [Andri.Weathersby@mci.com]  
**Sent:** Monday, January 05, 1998 6:46 AM  
**To:** 'SFO-DOC'  
**Subject:** FW: Response to USOC Request



12189701.DOC



12189703.DOC



12179701.DOC



12189702.DOC

FYI

-----Original Message-----

**From:** Sharon.R.Daniels@bridge.bellsouth.com  
[SMTP:Sharon.R.Daniels@bridge.bellsouth.com]  
**Sent:** Wednesday, December 24, 1997 8:53 PM  
**To:** Brian.Murdoch@mci.com  
**Cc:** Sharon.Mccreary1@bridge.bellsouth.com; andri.weathersby@mci.com  
**Subject:** Response to USOC Request

Brian:  
Attached is the response to your request for USOCs. As I mentioned in my voice mail to you, this issue came up last week during the OSS Workshop at the Georgia Public Service Commission. The response attached is the response that went out to all attendees at that workshop, and includes additional information. I am forwarding the entire package to you and will follow-up with a signed letter to you when I return to the office on January 5.  
Merry Christmas!  
Sharon

Retyped for electronic transmission

**Fred McCallum, Jr.**  
*General Counsel - Georgia*

**BellSouth Telecommunications, Inc.**  
Legal Department - Suite 376  
125 Perimeter Center West  
Atlanta, Georgia 30346

December 17, 1997

David Burgess, Director  
Telecommunications Division  
Georgia Public Service Commission  
47 Trinity Avenue, Room 520  
Atlanta, Georgia 30334

RE: Investigation into Development of Electronic Interfaces for BellSouth's  
Operational Support Systems; Docket No. 8354-U

Dear Mr. Burgess:

At the OSS Workshop last week, BellSouth agreed to provide an update on the availability of certain information pertaining to USOCs and FIDs. USOC's, the associated FIDs, and an explanation of the associated service offering are included in Volume 2 of the Local Exchange Ordering Guide, which can be accessed electronically at [www.bellsouth.com/interconnection/local](http://www.bellsouth.com/interconnection/local). The services that are listed in the Ordering Guide today are generally the retail services for which an electronic order can be placed. BellSouth will be adding the USOC's, and explanations for the remainder of BellSouth's retail services to the Ordering Guide on the website on January 6, 1998. BellSouth is researching the provision of FIDs for these remaining services. CLECs have the ability to download this information from the website if they so desire.

Participants also requested a list of services for which mechanized service order generation is available. This list is attached as Exhibit 1. All other services, including services with more than six line orders and those with billing telephone number to another number, involve manual entry for service order generation. With the exception of Synchronet, ISDN Basic Rate, PBX trunks, and hunting, all other complex services involve manual order entry, which is also true for BellSouth's retail customers.

Finally, this will confirm that the CGI specification, which was discussed extensively at the workshop, was sent to MCI on December 15, 1997.

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USOCs that are proprietary, such as BellSouth's internal corporate USOCs and certain USOCs related to the Federal government, will not be published.

David Burgess, Director  
December 17, 1997  
Page -2-

My notes reflect that we owe a response to the question about the capacity of BellSouth's electronic interfaces before the end of the year. We have most of this information together and hope to file this response in the next couple of days.

Sincerely,

*Fred McCallum Jr.*  
Fred McCallum Jr.

FMJ/imh

cc: Parties of Record

# Services Available for Ordering through Electronic Data Interchange with Mechanized Order Generation, as of 10/6/97

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- |   |                                   |
|---|-----------------------------------|
| 1. Area Plus  | 16. Measured Rate/Residence       |
| 2. Call Waiting Deluxe  | 17. Measured Rate/Business        |
| 3. Call Waiting   | 18. Memory Call                   |
| 4. Caller ID  | 19. Memory Call Answering Service |
| 5. Speed Calling  | 20. MTS                           |
| 6. 3-Way Calling  | 21. Optional Calling Plan         |
| 7. Call Forwarding - Variable   | 22. RCF                           |
| 8. Remote Access to CF  | 23. RingMaster® Services          |
| 9. Enhanced Caller ID   | 24. Call Tracing                  |
| 10. Flat Rate/Residence   | 25. Call Block                    |
| 11. Flat Rate/Business  | 26. Repeat Dialing                |
| 12. Georgia Community Calling   | 27. Call Selector                 |
| 13. Independent Payphone Provider   | 28. Call Return                   |
| 14. Integrated Package - Area Plus,<br>Area Plus w/Complete Choice<br>and Complete Choice | 29. Preferred Call Forwarding     |
| 15. Interim Number Portability  | 30. Touchtone                     |
|   | 31. Unbundled Loop                |
|   | 32. Unbundled Port                |
|   | 33. Visual Director               |

---

**BellSouth Interconnection Services**

1960 W. Exchange Place  
Suite 420  
Tucker, GA 30084

December 16, 1997

Brian Murdoch  
MCI  
780 Johnson Ferry Road  
Suite 500  
Atlanta, GA 30342

Dear Brian:

This is in response to your letters dated November 17 and 19, 1997 requesting the current version of BellSouth's USOC manual. Please see the attached letter from Fred McCallum to David Burgess, Georgia Public Service Commission, providing an update as to the availability of USOC information. As you can see, this letter was provided to counsel for MCI.

USOCs for some services are now available to CLECs through LENS or the Internet. The internet address is:

[www.bellsouth.com/interconnection/local/local\\_index.html](http://www.bellsouth.com/interconnection/local/local_index.html).

As indicated in the attached letter, BellSouth will be adding the USOCs and explanations for the remainder of BellSouth's retail services to the Ordering Guide on the website on January 6, 1998.

Due to the proprietary nature of BellSouth's internal corporate USOCs and certain USOCs related to the Federal government, all of which are contained in the USOC manual, BellSouth declines to provide to MCI a hard copy of the manual.

The database you referred to that integrates USOCs and the features availability matrix is a function of LENS. MCI has access to this by utilizing the features and services option of LENS. This will provide features as well as the USOCs for services ordered through LENS.

We will keep you informed of the status of the updated USOC file on the internet. Please call Sharon McCreary at 770-492-7520 if you have questions on USOCs in the interim.

Sincerely,

Sharon Daniels

Attachment





PARTIES OF RECORD

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BellSouth Interconnection  
Suite 420  
1960 West Exchange Place  
Tucker, Georgia 30084

770 492-7500

November 24, 1997

Helen Arthur  
MCI Telecommunications Corp.  
780 Johnson Ferry Rd  
Atlanta, Georgia 30342

Dear Helen,


During the BellSouth and MCI EDI testing call on November 4, 1997, MCI asked for a summary of USOC/tariff changes made since September 15, 1997.

On November 6, 1997 we provided you a copy of the BellSouth May 1, 1997, letter to Michael Beach, VP Local Markets, MCIMetro. The May 1, 1997 letter stated that BellSouth's retail service offerings, as well as notification regarding proposed changes to BellSouth's service offerings are located on the BellSouth web site at <http://cpr.bst.bellsouth.com>.

Subsequently MCI has reported dissatisfaction with the notice provided by BellSouth. MCI stated that it found the process to be time consuming and labor intensive and requested that a summary of all changes be provided to MCI. The web site notification is the most effective and efficient way for BellSouth to provide all telecommunications carriers with notification of changes to BellSouth's retail service offering. There is currently no tariff summary available nor are there plans to develop such a process.

If this is something MCI would like BellSouth to pursue further as a Business Opportunity Request (BOR) please let us know. We will be glad to assist you in completing the appropriate paperwork.

Sincerely,

  
Cliff Bowers

November 19, 1997

Sharon Daniels  
BellSouth Telecommunications, Inc.  
1960 W. Exchange Place  
Suite 420  
Tucker, Georgia 30084

Dear Ms. Daniels,

I write to clarify my November 17, 1997 request for USOC information. MCI requests that BellSouth provide a download of the requested USOC information in addition to a hard copy of the USOC Manual. Obtaining the download will save us from having to manually enter USOC information into our system, which could lead to errors and customer service problems. MCI understands that BellSouth has a database that integrates USOCs and the features availability matrix. As you know, BellSouth already has provided us a download of the matrix without USOCs. Obtaining the matrix and USOCs together is important to us because it would enable our customer service representatives easily to cross-reference service features and their corresponding codes. Please confirm that BellSouth has such an integrated database and, if it does, provide a download. Thank you for your assistance with this request.

Please provide a response to this request by November 26, 1997. This request sent via fax, electronic mail, and U.S. Mail.

Sincerely,

<Brian Murdoch's signature>

Brian Murdoch  
Southern Financial Operations

Cc: Andri Weathersby  
Wally Schmidt  
Jeremy Marcus

## **SFO-DOC**

---

**From:** Brian Murdoch [Brian.Murdoch@MCI.com]  
**Sent:** Monday, November 17, 1997 10:38 AM  
**To:** 'Sharon.R.Daniels@bridge.bellsouth.com'  
**Cc:** 'Andri Weathersby'; 'Wally Schmidt'



USOC.doc

November 17, 1997

Sharon Daniels  
BellSouth Telecommunications, Inc.  
1960 W. Exchange Place  
Suite 420  
Tucker, Georgia 30084

Dear Ms. Daniels,

MCI requests the current version of BellSouth's USOC Manual be provided either electronically or manually. MCI relies on accurate and complete definitions of USOC when placing orders for BellSouth services and products. While the on-line version, the CLEC USOC Manual, Regional Guide RG-USOC-001BT, Issue Sept\_17,1997-9/17/97, is in an acceptable format, it is not complete. For MCI to submit accurate local service requests, the USOC guide(s) is a necessity.

Please provide a response to this request by November 24, 1997. This request sent via fax, electronic mail, and U.S. Mail.

Sincerely,

<Brian Murdoch's signature>

Brian Murdoch  
Southern Financial Operations

Cc: Andri Weathersby  
Wally Schmidt  
Jeremy Marcus

**From:** Brian Murdoch [Brian.Murdoch@MCI.com]  
**Sent:** Tuesday, October 28, 1997 10:00 AM  
**To:** 'Wally Schmidt'; 'Jeremy Marcus'  
**Cc:** 'LEC Correspondence'  
**Subject:** FW: KY Platform Orders



MSG00000.TXT

fyi

-----Original Message-----

**From:** Kelli.Burgess  
[SMTP:Kelli.Burgess@bridge.bellsouth.com]  
**Sent:** Monday, October 27, 1997 8:24 PM  
**To:** Brian Murdoch  
**Cc:** Sharon.R.Daniels; Andri.Weathersby  
**Subject:** KY Platform Orders

Brian,

Yes, we should have the test order entered into our system by the end of this week. Bill Gulas is meeting with others to correct the problem with the USOC's and he does expect to have a resolution this week. I will send you an e-mail as soon as I have the FOC. I realize this is an inconvenience, but once this order is complete the other Kentucky orders of this type will flow smoothly. Leave a VMS or page me if you need anything. Pager# 1-800-946-4646 pin# 1434669.

Thanks,

Kelli

SFOHDOC

**From:** Brian Murdoch [Brian.Murdoch@MCI.com]  
**Sent:** Tuesday, October 14, 1997 7:25 PM  
**To:** 'Lakisha Riddick'; 'Jacqui Campbell'  
**Cc:** 'LEC Correspondence'; 'Andri Weathersby'; 'Wally Schmidt'  
**Subject:** USOC Manual

BST has stated that it will not distribute its USOC manual due to it being proprietary information. Alternate sources would be CSRs, the web-based USOC guide (does not include complex service USOCs), and the web-based LEO Guide.

Brian Murdoch  
SFO  
V825-6591



**SFO-DOC**

**From:** Brian Murdoch [Brian.Murdoch@MCI.com]  
**Sent:** Wednesday, October 15, 1997 2:17 PM  
**To:** 'Wally Schmidt'  
**Subject:** FW: USOC Manual

Here's the response.

-----Original Message-----

**From:** Sharon R. Daniels@bridge.bellsouth.com  
[SMTP:Sharon.R.Daniels@bridge.bellsouth.com]  
**Sent:** Wednesday, October 15, 1997 7:55 AM  
**To:** Brian.Murdoch@MCI.com  
**Cc:** Ilene.M.Barnett@bridge.bellsouth.com;  
Sharon.Mccreary1@bridge.bellsouth.com;  
Thomas.Mcfall1@bridge.bellsouth.com;  
Rebecca.W.Williams@bridge.bellsouth.com  
**Subject:** USOC Manual

Brian:

After our conversation yesterday, I did some additional investigation. The reason BellSouth cannot provide you with copies of our existing USOC manual is that it contains customer specific special assembly USOCs. This information is considered proprietary in this format. If you would like me to run this issue on more time, I will be happy to do so.

Let's discuss in our meeting tomorrow.

Sharon

SFO-DICG

**From:** Brian Murdoch [Brian.Murdoch@MCI.Com]  
**Sent:** Monday, September 22, 1997 7:43 PM  
**To:** 'Tom McFall'  
**Subject:** BNA USOCs and LSRs

Tom,

Have you been able to find out any information regarding the BNA USOC? I need to know what the USOC is and possibly a description.

My other question is regarding LSRs. When placing orders in the BST region, are there specific LSR forms and directions for specific states?

Thank you,

Brian

## **SFO-DOC**

---

**From:** Alan Anglyn [Alan.Anglyn@MCI.com]  
**Sent:** Thursday, January 29, 1998 10:08 AM  
**To:** Beverly Gordon (E-mail); Michael Willis (E-mail)  
**Subject:** FW: Community Name - Spelled Out or Abbreviated

F/R RSAG

-----Original Message-----

**From:** Judy.Rueblinger1@bridge.bellsouth.com  
**[SMTP:Judy.Rueblinger1@bridge.bellsouth.com]**  
**Sent:** Thursday, January 22, 1998 7:41 AM  
**To:** alan.anglyn@mci.com  
**Cc:** Clifford.H.Bowers@bridge.bellsouth.com; beverly.gordon@mci.com  
**Subject:** Community Name - Spelled Out or Abbreviated

Alan,

On Monday I sent you an e-mail advising that this issue has been referred to the RTRG. The reason is that if we allowed CLECs to submit the communities spelled out through EDI it would be in conflict with what we ask the CLECs to do for paper requests. My folks are telling me that we require RSAG validated communities on paper LSRs. You have said that your findings are different and I have passed this on.

Something I thought would help you is to understand what happens today when an order submitted through EDI has the community name spelled out. This was confirmed with our EDI personnel.

If an order comes in through EDI and does not fall out for manual handling, it would be RSAG validated mechanically (before the service order is generated). If the community name is correctly spelled out so that a "direct hit" could be obtained from RSAG, the community, spelled out or abbreviated, as it appears in RSAG would be returned and populated on the service order. If the community is not spelled out correctly a "direct hit" cannot be obtained from RSAG and the request would be rejected. For orders that require manual handling such as complex services, the community (abbreviated or spelled out) as it appears in RSAG would be required on the request.

As I know more information on this I will certainly let you know.

Thanks,

Judy

**Beverly Gordon**

**From:** Alan Anglyn [Alan.Anglyn@MCI.com]  
**Sent:** Thursday, January 29, 1998 10:47 AM  
**To:** Beverly Gordon (E-mail); Michael Willis (E-mail)  
**Subject:** FW: Community Names

F/R MSAG

-----Original Message-----

**From:** Judy.Rueblinger1@bridge.bellsouth.com  
[SMTP:Judy.Rueblinger1@bridge.bellsouth.com]  
**Sent:** Tuesday, January 13, 1998 10:35 AM  
**To:** alan.anglyn@mci.com  
**Cc:** Clifford.H.Bowers@bridge.bellsouth.com;  
Sharon.R.Daniels@bridge.bellsouth.com  
**Subject:** Community Names

Alan,

Just wanted to keep you statused on our progress investigating the MSAG list of community names.

First of all for Georgia, we have verified that there are no duplicate communities. It seems there was some incorrect information in the database. We are in the process of getting that cleaned up. We will try to get an updated list to you by the end of this week but it may be early next week.

The discrepancies in Georgia sparked my concern for the accuracy in the other states. I am in the process of getting the respective AFIG centers to investigate their state communities like we did for Georgia. This may take a couple of weeks or so. I will definitely try to get Florida done sooner, if possible.

If you have any questions please call me.

Thanks,

Judy



**MCI Teleco  
Corporation**

780 Johnson Ferry Road  
Atlanta, GA 30342  
404 267 5500

December 16, 1997

Bob Siegel  
Product Manager  
BellSouth Interconnection Services  
Room 34A35  
675 W. Peachtree Street, N.E.  
Atlanta, Georgia 30375

Bob,

This letter is in response to the proposal provided to MCI on 12/04/97 relative to the cost to provide an extract of your RSAG database.

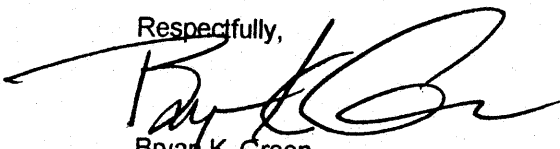
As you know, for several months we have been requesting that BellSouth provide MCI with a download of the RSAG database. The RSAG database is necessary to allow MCI to validate addresses in our own front end system prior to submitting an order to BellSouth. This capability will improve order processing time, reduce the amount of rework for both companies due to errors and decrease the cost of doing business. As you are aware, the RSAG issue is now pending before the Georgia Public Service Commission.

As an interim measure pending the outcome of the PSC proceeding, you have proposed that BellSouth provide an extract of the RSAG database based on the following cost structure:

- \$30,000 – Project plan, timeline, and final proposal
- \$538,030 – Total Start of costs for the new connections; and
- \$8,650 – Monthly recurring charge

MCI rejects this offer because our Interconnection Agreement entitles us to receive a download of the entire RSAG at no cost. MCI again requests BellSouth to comply with the agreement by providing a complete RSAG download to MCI immediately.

Respectfully,



Bryan K. Green  
Sr. Manager –OSS Implementation  
404-267-5515

cc: Marcel Henry  
Pam Lee  
Charlene Keys  
Joe Baker

## **SFO-DOC**

---

**From:** Alan Anglyn [Alan.Anglyn@MCI.com]  
**Sent:** Monday, December 15, 1997 9:59 AM  
**To:** Anna Hopkins (E-mail); Brian Murdoch (E-mail); Bryan Green (E-mail); Helen Arthur (E-mail); Vickie Williams (E-mail)  
**Cc:** Beverly Gordon (E-mail); Michael Willis (E-mail); Jim Jacobsen (E-mail)  
**Subject:** FW: RSAG Validation

Following is BellSouth's response to my question as to where does BellSouth document that LSR service addresses must match RSAG abbreviated city names.

I'm really surprised BST would respond that such a general statement would cover the nuances of their ordering requirements for city names.

Beverly & Michael,

F/R: RSAG

-----Original Message-----

**From:** Judy.Rueblinger1@bridge.bellsouth.com  
**[SMTP:Judy.Rueblinger1@bridge.bellsouth.com]**  
**Sent:** Wednesday, December 10, 1997 7:57 AM  
**To:** alan.anglyn@mci.com  
**Cc:** Clifford.H.Bowers@bridge.bellsouth.com;  
Rebecca.W.Williams@bridge.bellsouth.com  
**Subject:** RSAG Validation

Alan,

You asked us in last week's Resale conference call to let you know where it is documented that requests must be RSAG validated.

The CLEC Ordering Guide, Pre-Ordering Information tab, page 2-2 states, "The information and functions available through the pre-ordering interfaces are important to help a CLEC ensure the accuracy and quality of their LSRs. The validation will also help prevent unnecessary delays and fallout".

The next update of the ordering guide will be more explicit.

Thanks,

Judy

## **SFO-DOC**

---

**From:** Beverly Gordon [Beverly.Gordon@mci.com]  
**Sent:** Monday, December 15, 1997 2:47 PM  
**To:** 'sfo-doc@mci.com'  
**Subject:** FW: MSAG/RSAG Community Name

-----Original Message-----

**From:** Alan Anglyn [SMTP:Alan.Anglyn@MCI.com]  
**Sent:** Monday, December 15, 1997 10:32 AM  
**To:** 'Judy.Rueblinger1@bridge.bellsouth.com'  
**Cc:** Clifford.H.Bowers@bridge.bellsouth.com;  
Sharon.R.Daniels@bridge.bellsouth.com; Beverly Gordon (E-mail); Bryan Green  
(E-mail); Helen Arthur (E-mail)  
**Subject:** RE: MSAG/RSAG Community Name

Judy,

Thank you for the response. This helps explain why there are duplicates on the files. As a CLEC, is MCI impacted by this? Here is what I am thinking.

- \* MCI will not know if a particular customer's house number and street name duplicates one that exists in BellSouth's database.
- \* BellSouth requires a valid RSAG abbreviated city name. In situations where there are duplicate abbreviations, MCI can use either of the abbreviations equally well without either being rejected. However, likely we would pick one or the other and use it all the time. For example, we might always use the first abbreviation and never the second.

In summary as long as we provide a valid abbreviated city name, then the LSR will process successfully. If this is not the case, BellSouth needs to provide the business rules for use of RSAG abbreviations.

Thank you,  
Alan

-----Original Message-----

**From:** Judy.Rueblinger1@bridge.bellsouth.com  
[SMTP:Judy.Rueblinger1@bridge.bellsouth.com]  
**Sent:** Friday, December 12, 1997 1:44 PM  
**To:** alan.anglyn@mci.com  
**Cc:** Clifford.H.Bowers@bridge.bellsouth.com;  
Sharon.R.Daniels@bridge.bellsouth.com  
**Subject:** MSAG/RSAG Community Name

Alan,

The reason duplicate communities appear on the report is because there are duplicate customers with the same house number and street name in the same community. BellSouth tried to get these cleaned up years ago when RSAG and E911 databases were created but these customer's refused to change numbers. The only way to differentiate between the two customers was to give them different communities.

In order for you to know which one to use you would have to check the CSR record to see what the community abbreviation showed on the record.

Hope this helps.  
Judy

**From:** Alan Anglyn [Alan.Anglyn@MCI.com]  
**Sent:** Monday, December 15, 1997 2:31 PM  
**To:** Michael Willis (E-mail)  
**Subject:** FW: MSAG / RSAG question on use of Street Name and Thorough Fare



BS MSAG GA Cove  
Records to RSA... F/R MSAG

-----Original Message-----

**From:** Alan Anglyn [SMTP:Alan.Anglyn@MCI.com]  
**Sent:** Monday, December 15, 1997 1:24 PM  
**To:** Judy Rueblinger (E-mail)  
**Cc:** Beverly Gordon (E-mail); Bryan Green (E-mail); Cliff Bowers (E-mail); Vickie Williams (E-mail)  
**Subject:** MSAG / RSAG question on use of Street Name and Thorough Fare

Judy,

In our December 3rd conference call, I asked the following question: "Our review of MSAG and the address validation capability provided via LENS has shown instances of the thoroughfare being included with the street name field. This seems to occur most frequently with "Cove". Is this in error or are there business rules that determine when this might be true?" I agreed to provide some examples. Enclosed is a spreadsheet that lists 10 instances of "Cove" and the related MSAG Street Name and RSAG Street Name/Thorough Fare. At random, I chose to do this with street names beginning with 'C'. I would expect similar results street names beginning with other letters of the alphabet.

With this sample of ten, all ten have 'Cove' in the street name field of MSAG. However, in RSAG, three of these have 'Cove' in the Thorough Fare field. The other seven cases, 'Cove' was included in the street name of RSAG.

As you know, in the absence of BellSouth providing RSAG data, we are working to try and use MSAG data to facilitate address validation, an approach suggested by BellSouth. If this approach is to be successful, we need two things - one, clearly defined business rules, and two, consistency in the treatment of data within and across MSAG and RSAG. Hopefully, the enclosed examples will help facilitate closure of this issue.

Thank you,  
Alan



MSAG STREET NAME	MSAG COMMUNITY	LOW RANGE	HIGH RANGE
CHEROKEE FARMS COVE NE	BUFORD	2061	2102
CHERRY COVE	DALLAS	3301	3310
CLASSIC COVE	DUNWOODY	100	199
COACHMAN COVE SW	SNELLVILLE	1800	1899
COBBS CREEK COVE	DECATUR	1586	1607
COLLINS PORT COVE NW	SUWANEE	2402	2667
COLONY COVE	ALPHARETTA	300	400
COLUMBIA COVE	DECATUR	2900	3099
COMB'S COVE NW	MARIETTA	2389	2400
CORNERS COVE	DUNWOODY	1700	1799

ROYAL STREET PSAC 11F

Cherokee Farms	Cv
Cherry Cove	
Classic Cove	
Coachman	Cv
Cobbs Creek Cove	
Collins Port	Cv
Colony Cove	
Columbia Cove	
Comb's Cove	
Corners Cove	



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BellSouth Interconnection Services  
Room 34A35  
675 West Peachtree Street, N.E.  
Atlanta, Georgia 30375

12/02/97

Bryan Green  
Sr. Manager - Systems Implementation  
MCI Telecommunications  
780 Johnson Ferry Road  
Suite 500  
Atlanta, Ga. 30342

Dear Bryan:

This letter is a response to your request that BellSouth provide MCI extracts from our Regional Street Address Guide (RSAG) database of the information necessary to perform address validations.. The cost estimate has been developed based on your stated need of submitting Local Service Requests with valid address. Your objective is to use the RSAG data to support your front end edits.

The proposal is for two extract files to be produced and sent to MCI every night. Please note that these are complete files and not updates. The data will be sent via Connect:Direct. MCI will be responsible for the cost of the circuit and modem equipment to connect to BellSouth as well as all hardware and software at your location needed to receive and process the data. The cost for that connection is not included here.

The following is a preliminary estimate of the costs to build and maintain the RSAG data delivery system. The final price for this project will be within +/- 15% of this estimate. In order to proceed, BellSouth must put a project team in place, develop a project plan and timelines for this work in conjunction with MCI, and develop a final price for the project. The cost for this initial phase is \$30,000 which will count toward the overall price. You will be asked to approve the project plan and final price before we move into the development phase.

Project plan, timeline, and final proposal	\$30,000
Total Startup costs for the new connection	\$538,030
Monthly recurring charge	\$8,650

Please sign below and return this letter to me if you accept this estimate and agree to pay the \$30,000 cost for the development of the project plan, timelines, and final price. Upon completion of the project plan, timelines, and final proposal, you will be asked to approve the project plan and final price before proceeding with the implementation of this arrangement. Your signature below will authorize BellSouth to proceed with final costs and a project plan for this work.

\_\_\_\_\_  
Bob Siegel - BellSouth

\_\_\_\_\_  
Authorized Signature - MCI

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date

BellSouth Interconnection Services

© BELL SOUTH

**BELLSOUTH INTERCONNECTION SERVICES****MARCOM GROUP***34p 70 BellSouth Center**675 West Peachtree Street, N.E.**Atlanta, Georgia 30375***FAX NUMBER***(404) 927-8577**584-7074*

FROM: ☐ TOM MOQUIN (404) 927-7382  
☐ ANN SMITH (404) 927-7599  
☐ JOELLYN SARGENT (404) 927-7199  
☐ PATTI BAUERNFEIND (404) 927-7927  
☐ SHERYL CHAPMAN (404) 927-7996  
☐ MARION DYE (404) 927-7928  
☐ AMY MERSHON (404) 927-7557  
☐ BRIAN FAIN (404) 927-7553  
☐ TEMPLE MCDANIEL (404) 927-7565  
☐ JIM JACKSON (404) 927-7516  
☐ KIM DICKIE (404) 927-8639  
☒ *Bob Siegel* (404) 267-6556

TO: Bryan Green

PHONE NUMBER: \_\_\_\_\_

FAX NUMBER: 404-267-6556NUMBER OF PAGES INCLUDING COVER SHEET 3

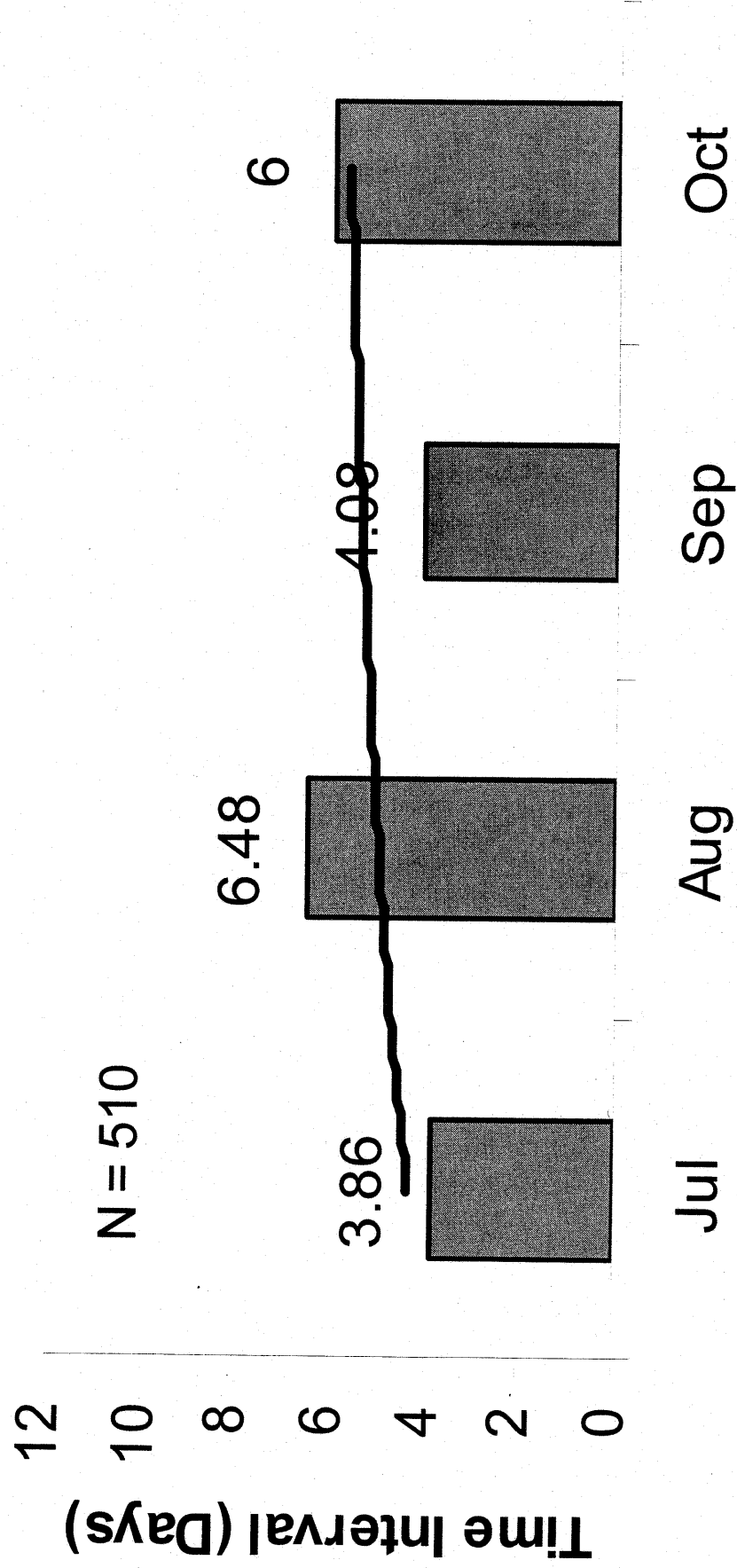
Private/Proprietary: No disclosure outside BellSouth except by written agreement.

1

**SUPPLEMENTAL RESPONSE TO DATA REQUEST  
NO. 4**

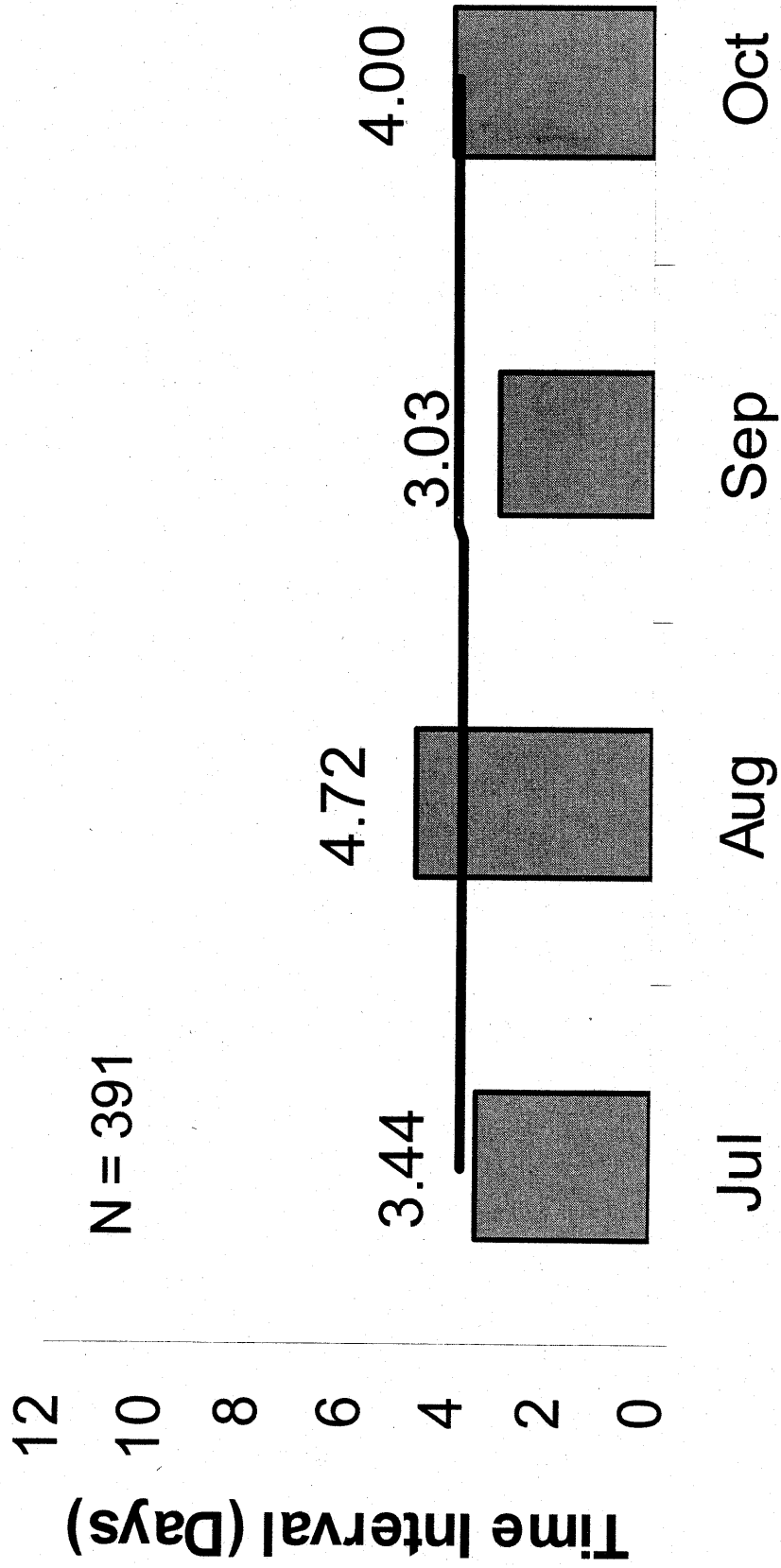
# Operational Trial

## Monthly Average Order Completion Interval Trends



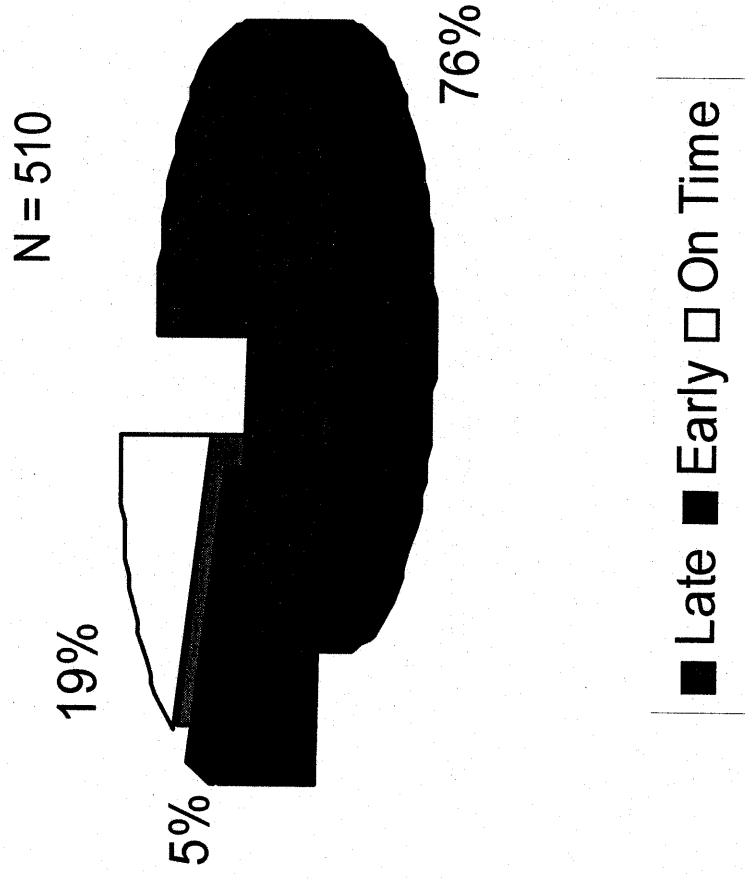
# Migrate-As-Is and Migrate-As-Specified

## Monthly Average Order Completion Interval



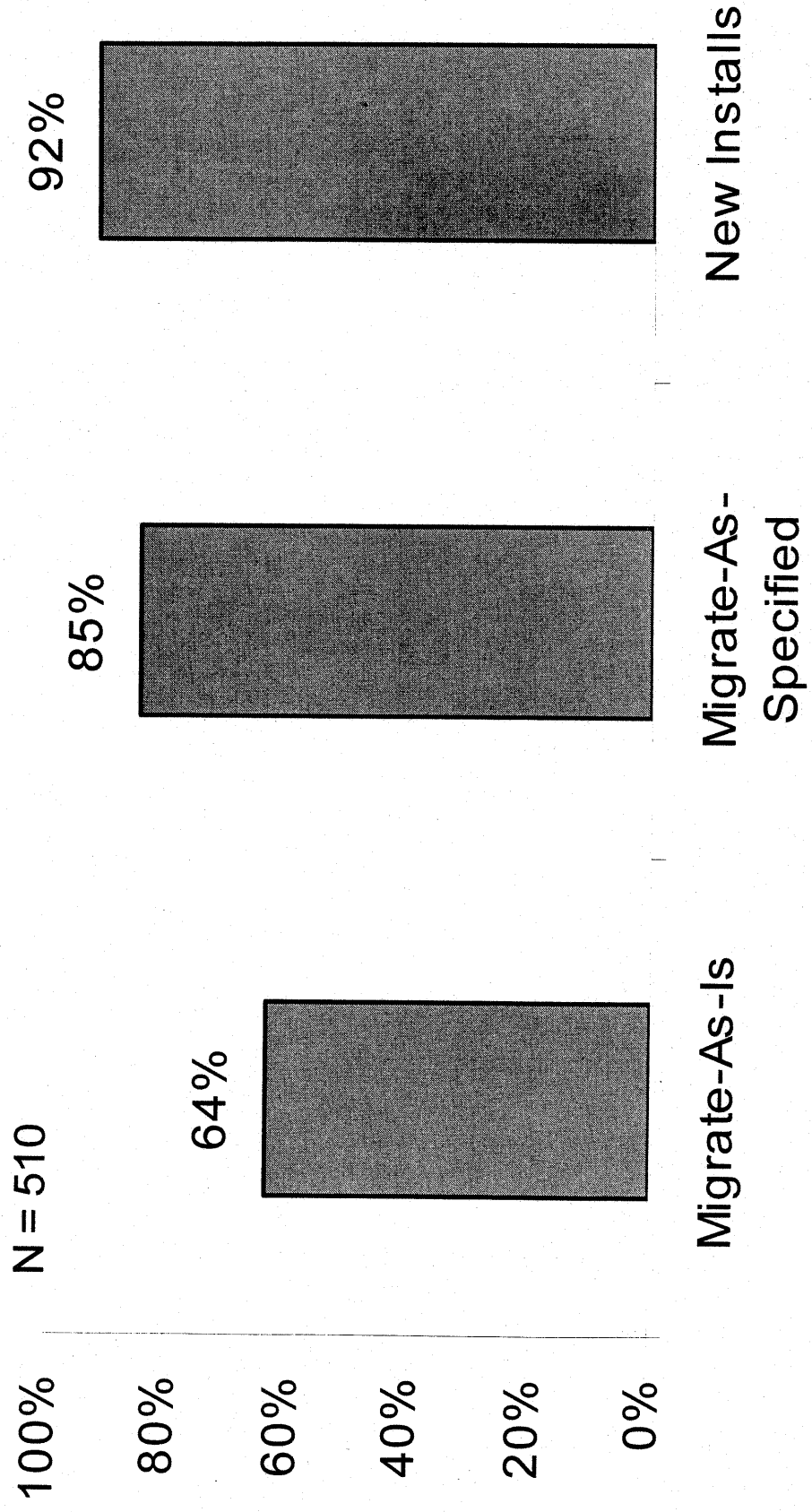


# Operational Trial Desired Due Date Accuracy



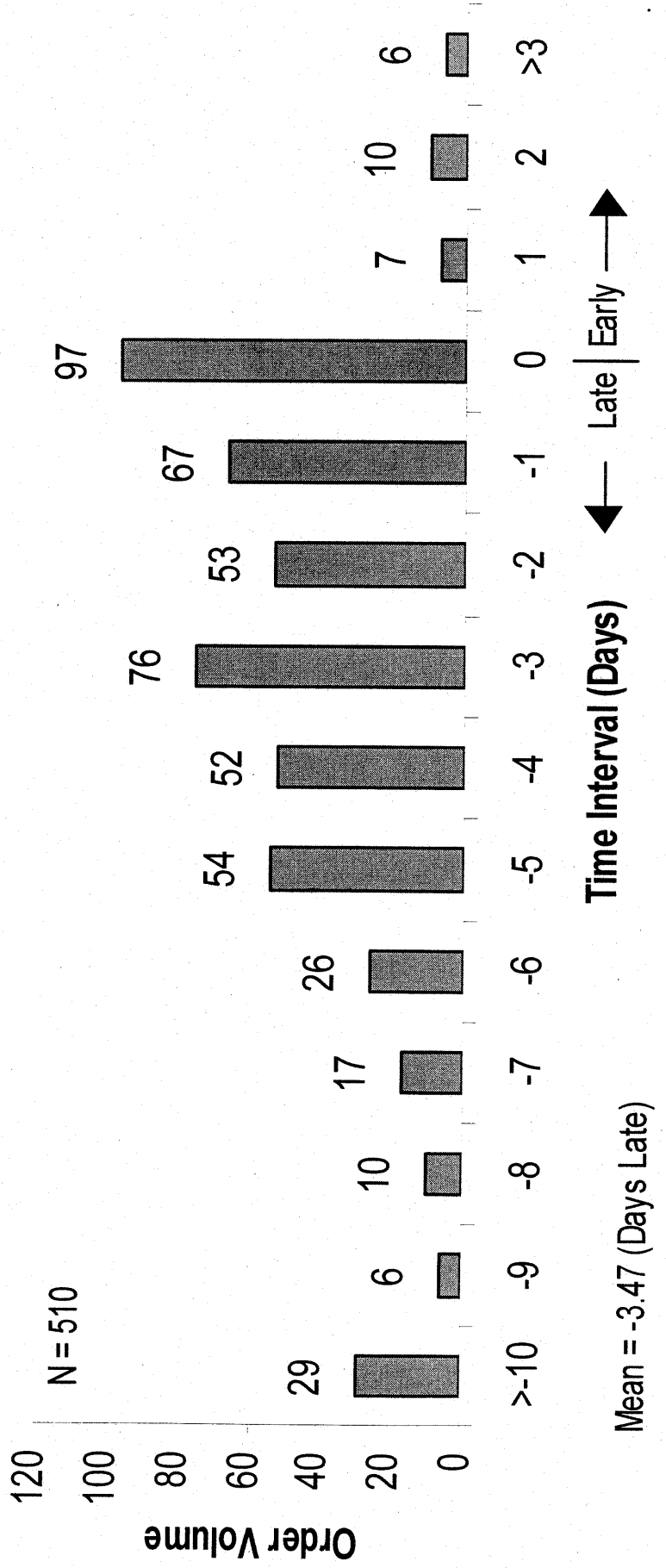
# Operational Trial

## Orders Completed After Desired Due Date



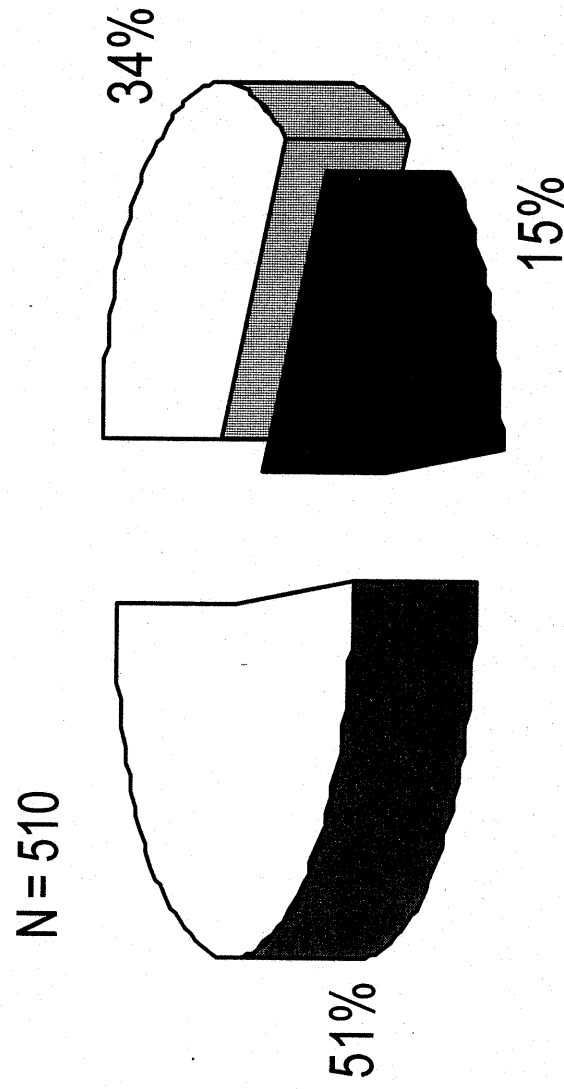
# Operational Trial

## Desired Due Date To Order Completion Intervals



# Operational Trial

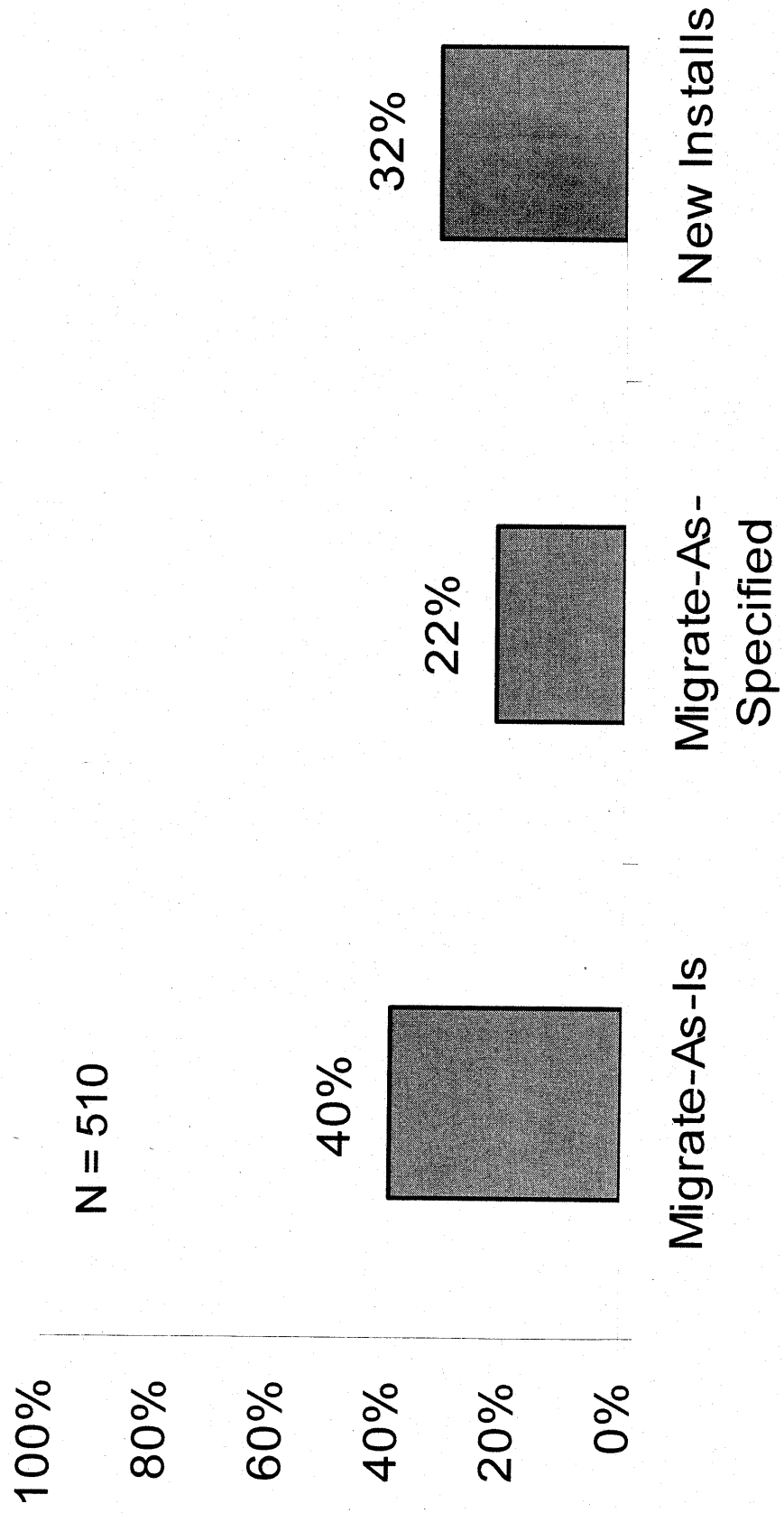
## Firm Order Confirmation Date Accuracy



□ Late ■ Early □ On Time

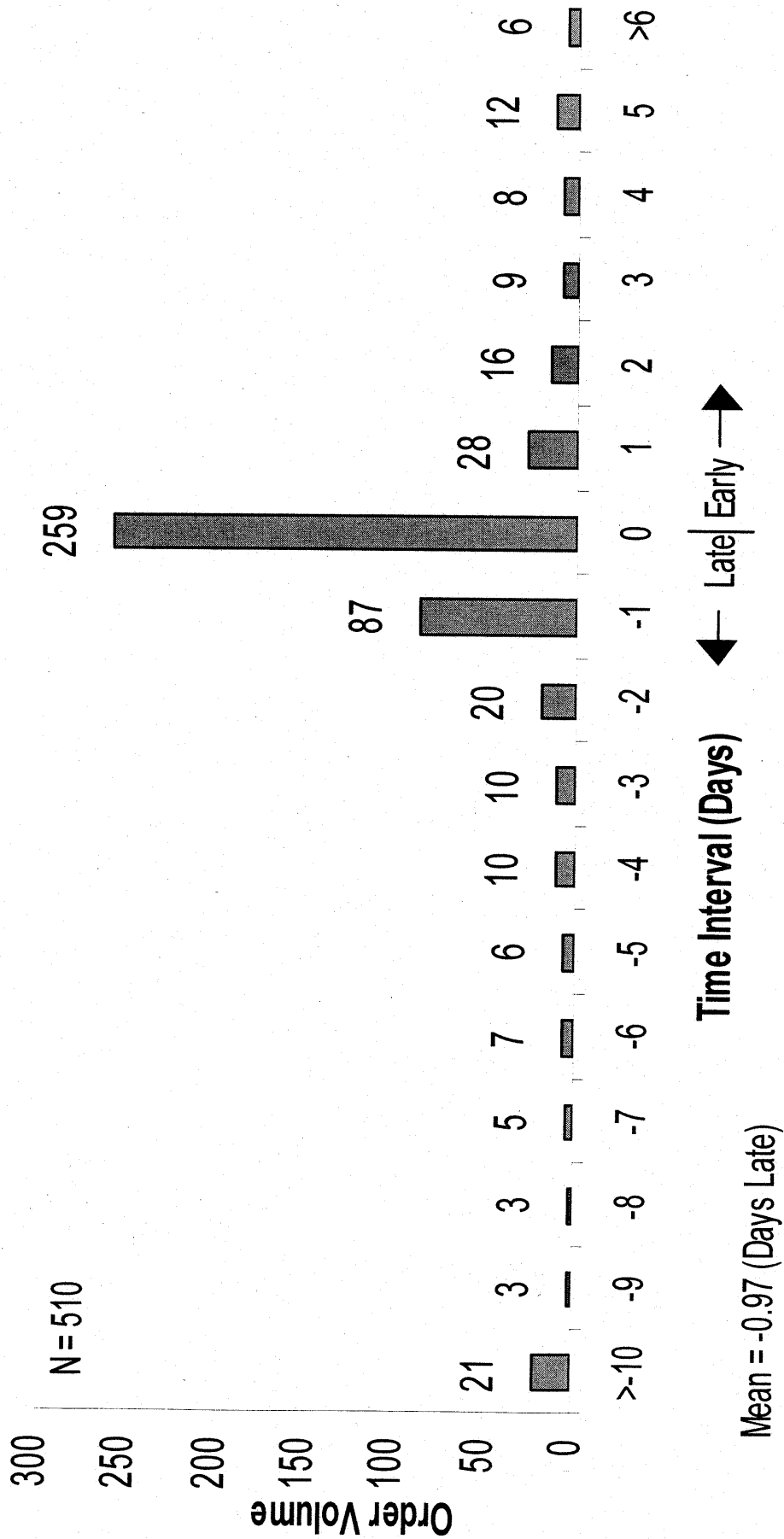
# Operational Trial

## Orders Completed After Firm Order Confirmation Date

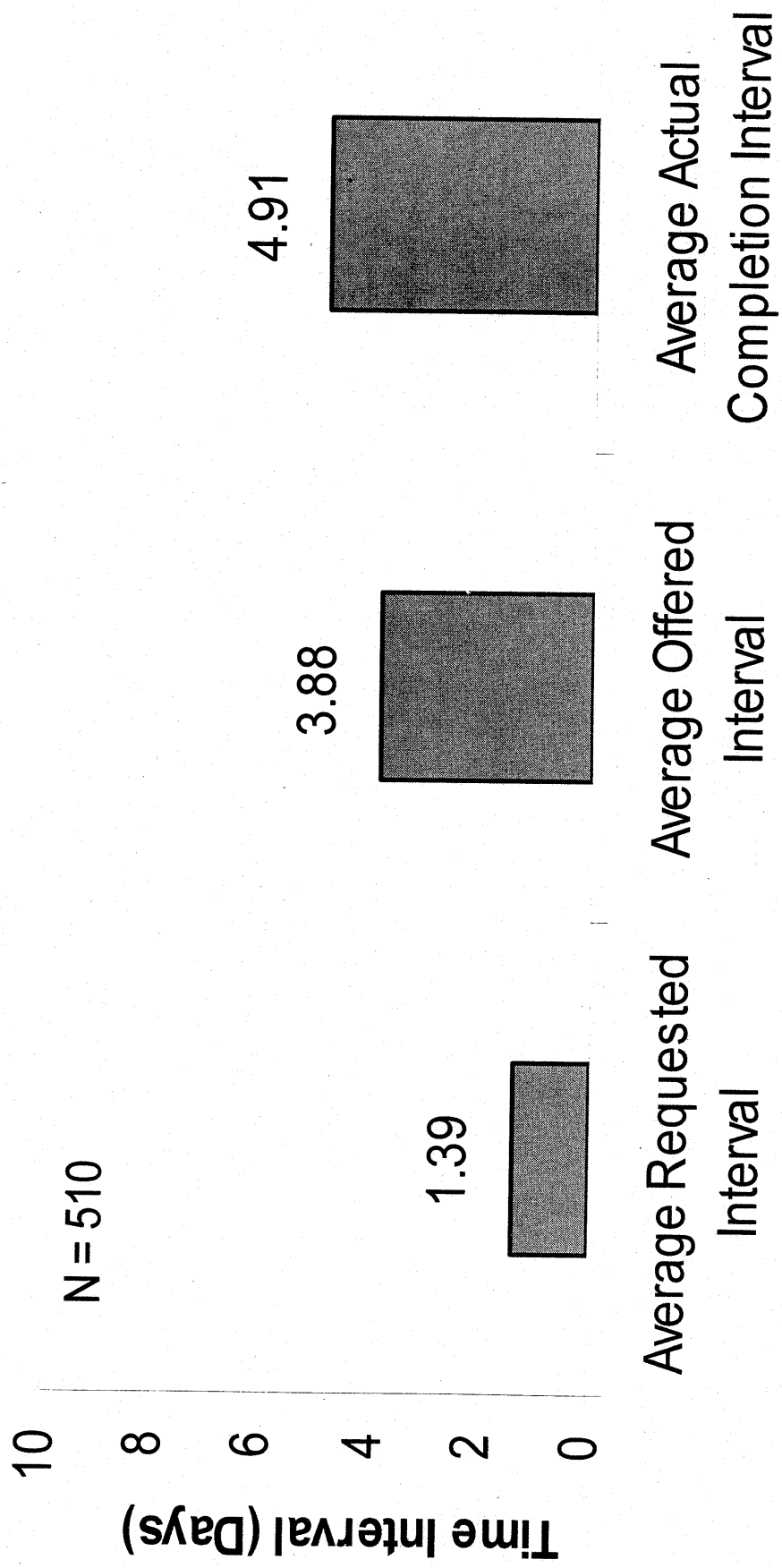


# Operational Trial

## Firm Order Confirmation To Order Completion Intervals



# Operational Trial Interval Comparisons



# Operational Trial Status

## (As Of 10/27/97)

- 562 Orders have been processed
  - Order Types comprised of Migrate-As-Is (49%), Migrate-As-Specified (26%), and New (25%)
- Order Status
  - 1.78% of Orders are in a Pending Status
- Order Completion Interval
  - As of 10/27/97, Average Interval Performance is 4.91 days
- Desired Due Date
  - 76% of all DDDs are late
  - Average late time is 4.76 days late
  - Average overall is 3.47 days late
- Firm Order Confirmation
  - 34% of all FOCs are late
  - Average late time is 4.71 days late
  - Average overall is .97 days late



# Migrate-As-Is Status

- 273 Orders have been processed
  - No Orders are in an Incomplete Status
- Order Completion Interval
  - As of 10/27/97, Average Interval Performance is 2.65 days
- Desired Due Date
  - 64% DDDs are late
  - Average late time is 3.41 days late
  - Average overall is 1.83 days late
- Firm Order Confirmation
  - 40% of all FOCs are late
  - Average late time is 3.21 days late
  - Average overall is .61 days late

# Migrate-As-Specified Status

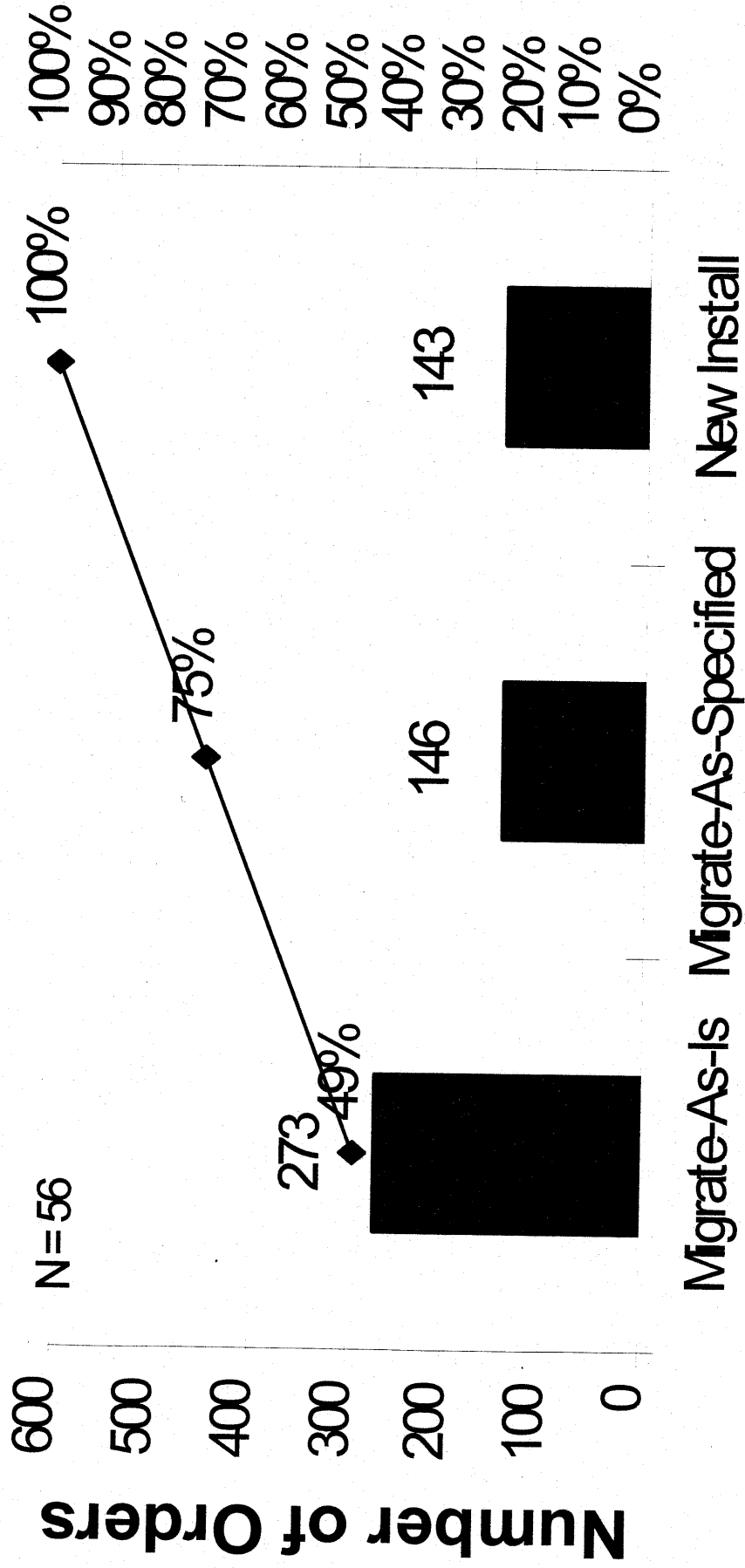
- 146 Orders have been processed
  - 1.37% of Orders are in an Incomplete Status
- Order Completion Interval
  - As of 10/27/97, Average Interval Performance is 5.79 days
- Desired Due Date
  - 85% DDDs are late
  - Average late time is 4.49 days late
  - Average overall is 4.06 days late
- Firm Order Confirmation
  - 22% of all FOCs are late
  - Average late time is 4.69 days late
  - Average overall is .69 days late

# New Install Status

- 143 Orders have been processed
  - 5.59% of Orders are in an Incomplete Status
- Order Completion Interval
  - As of 10/27/97, Average Interval Performance is 8.80 days
- Desired Due Date
  - 92% DDDs are late
  - Average late time is 6.89 days late
  - Average overall is 6.39 days late
- Firm Order Confirmation
  - 32% of all FOCs are late
  - Average late time is 8.14 days late
  - Average overall is 2.04 days late

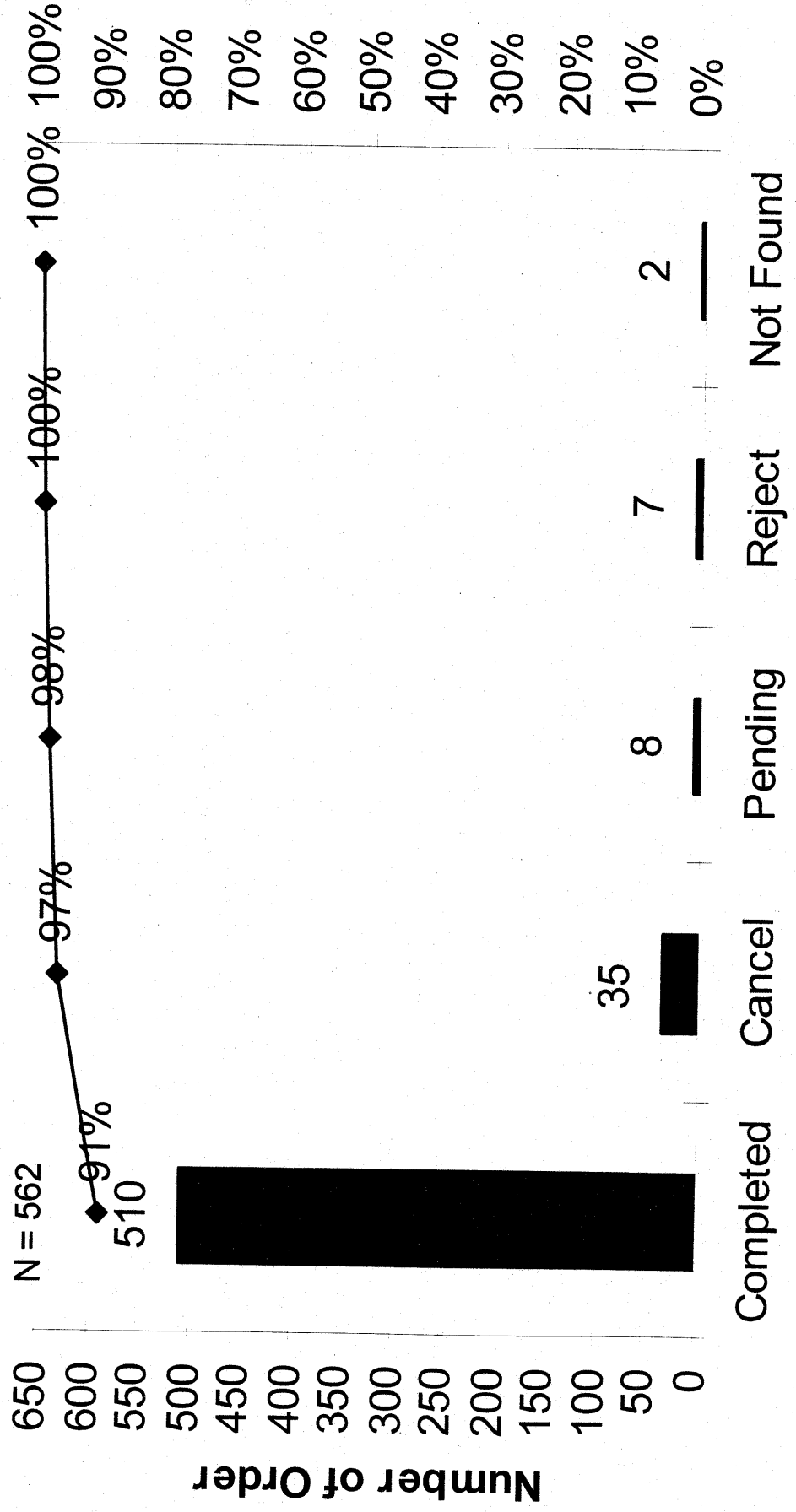
# Operational Trial Order Types

(Through 10/27/97)



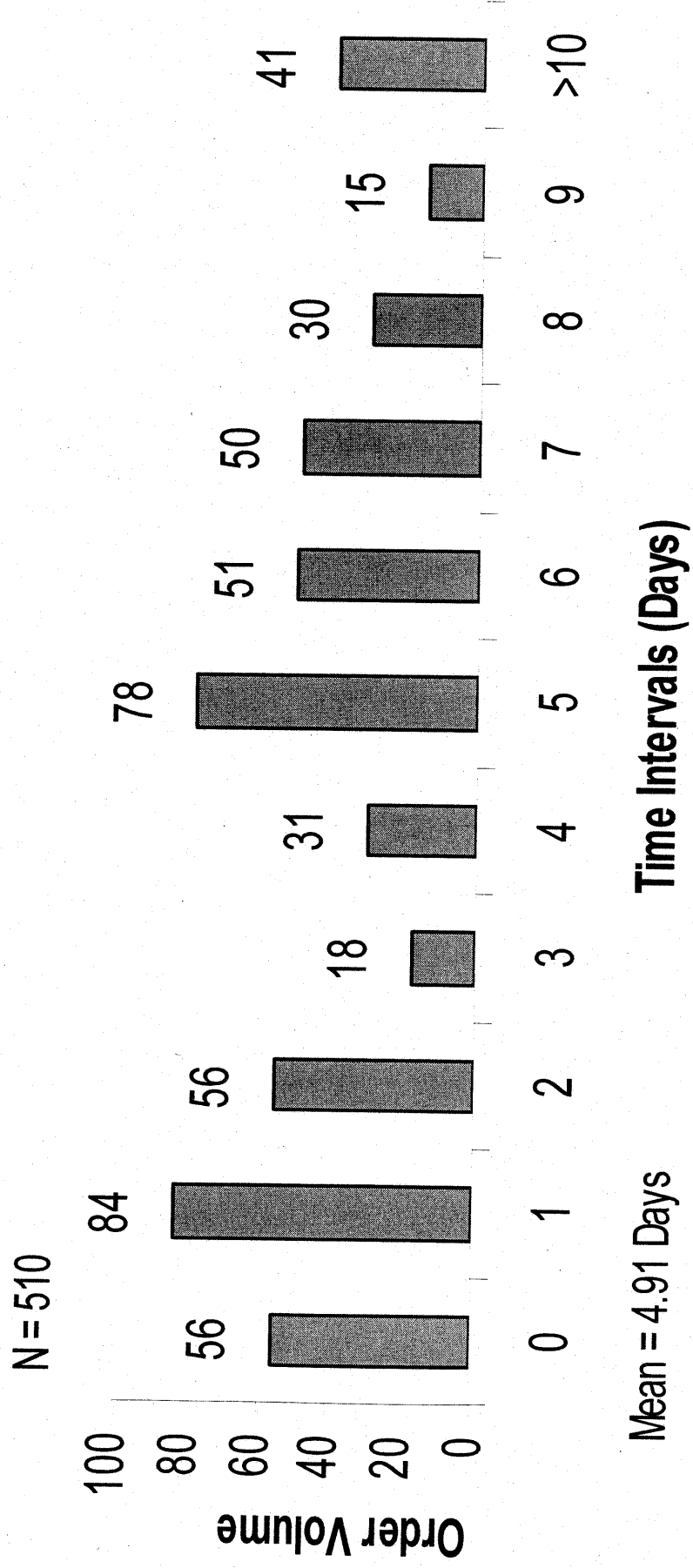
# Operational Trial Order Status

(Through 10/27/97)



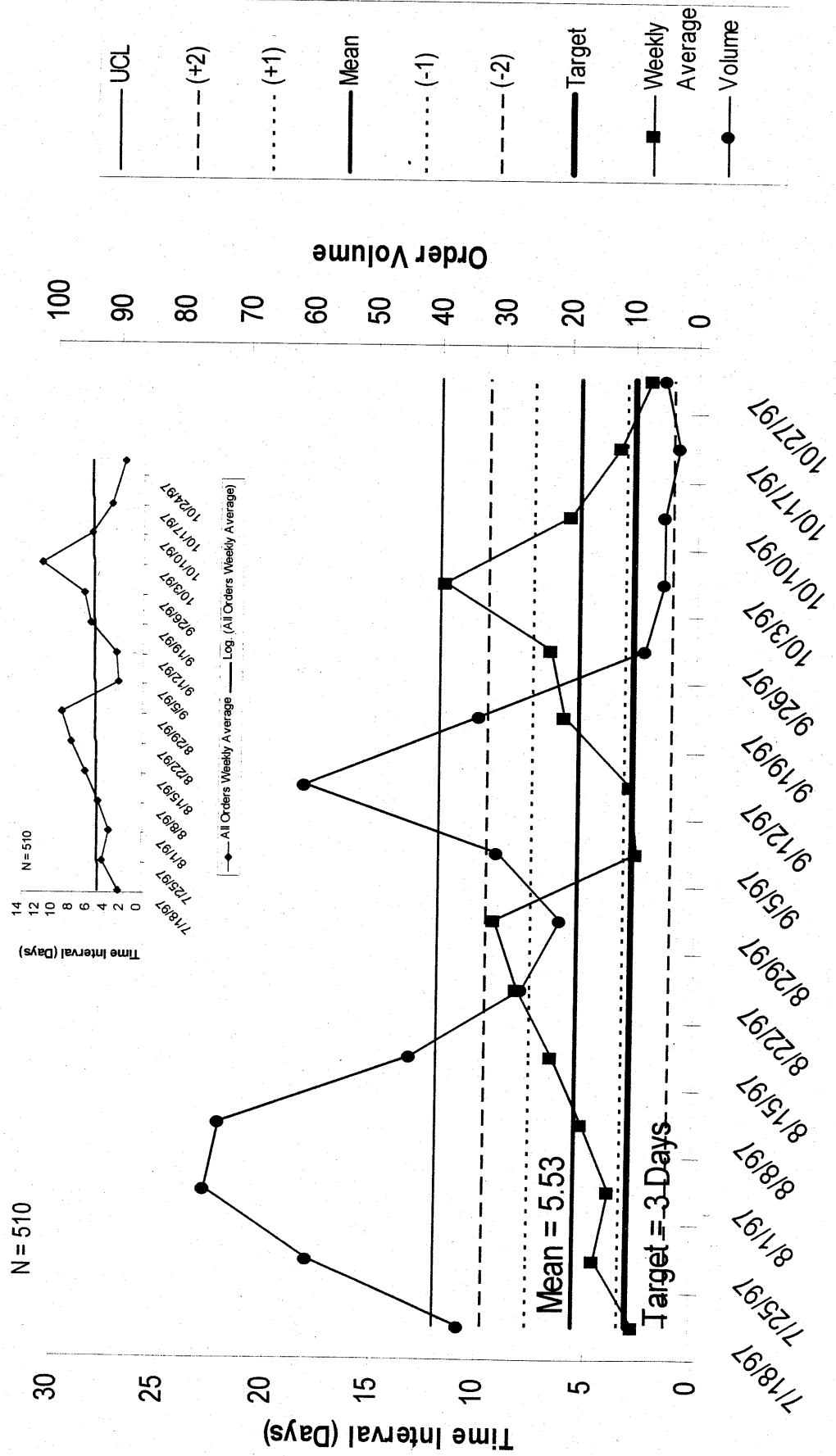
# Operational Trial

## Order Completion Intervals



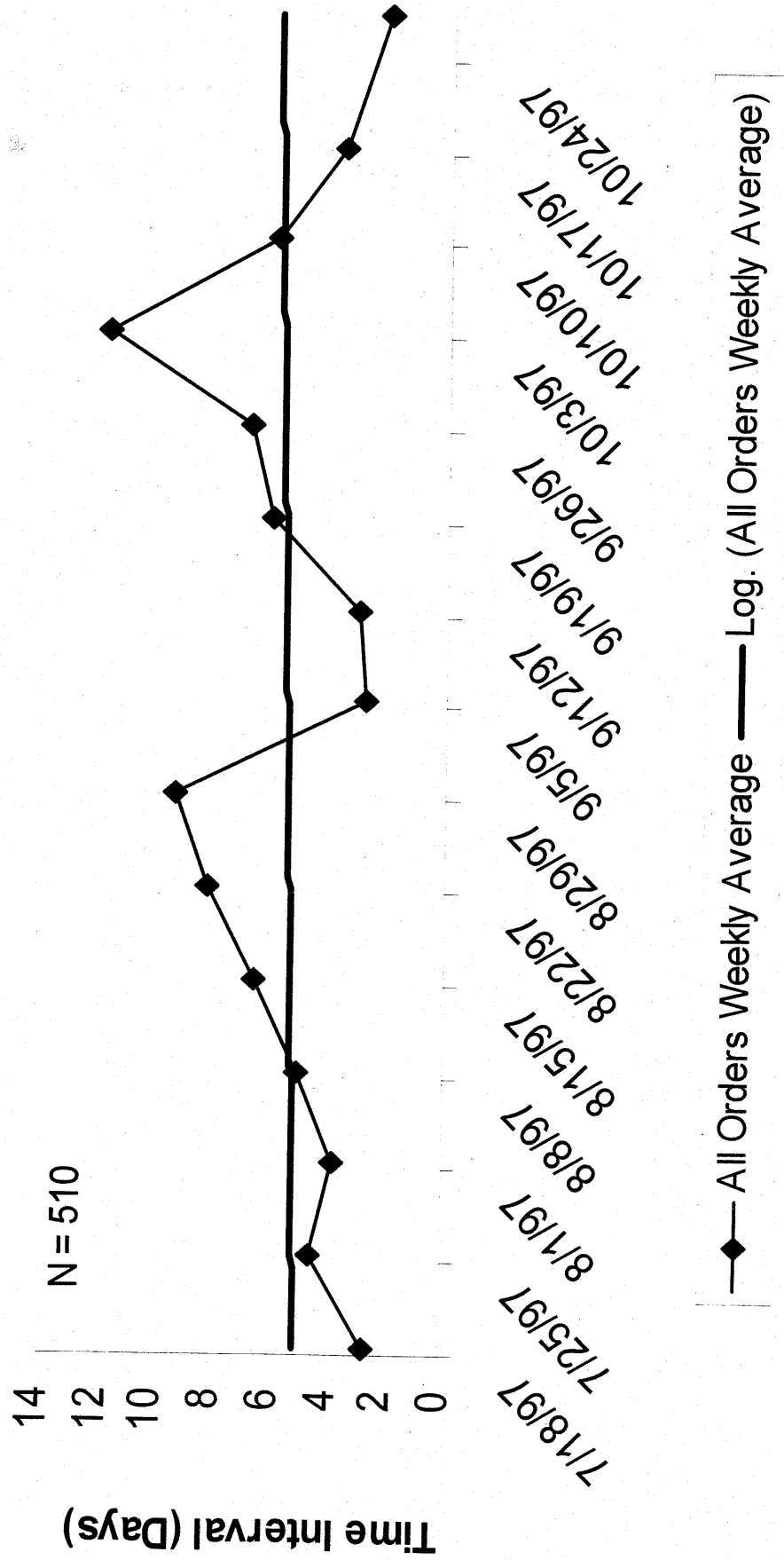
# Operational Trial

## Weekly Average Order Completion Intervals



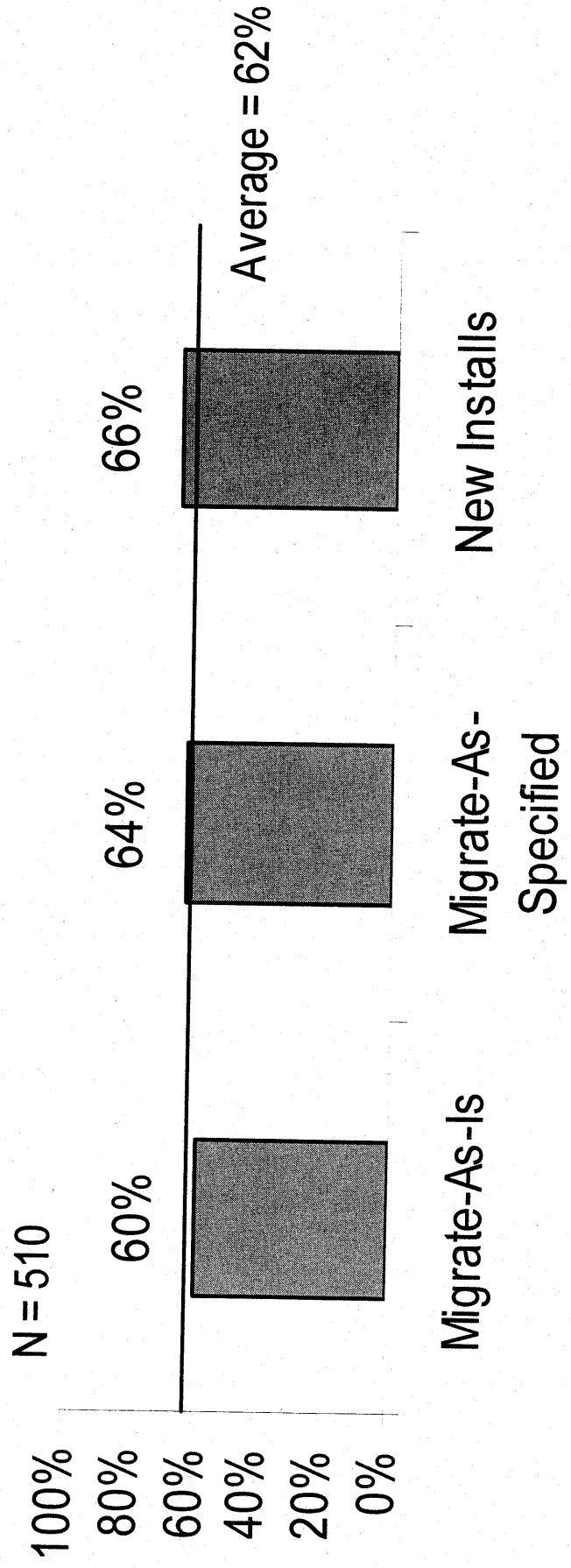
# Operational Trial

## Weekly Average Order Completion Interval Trends



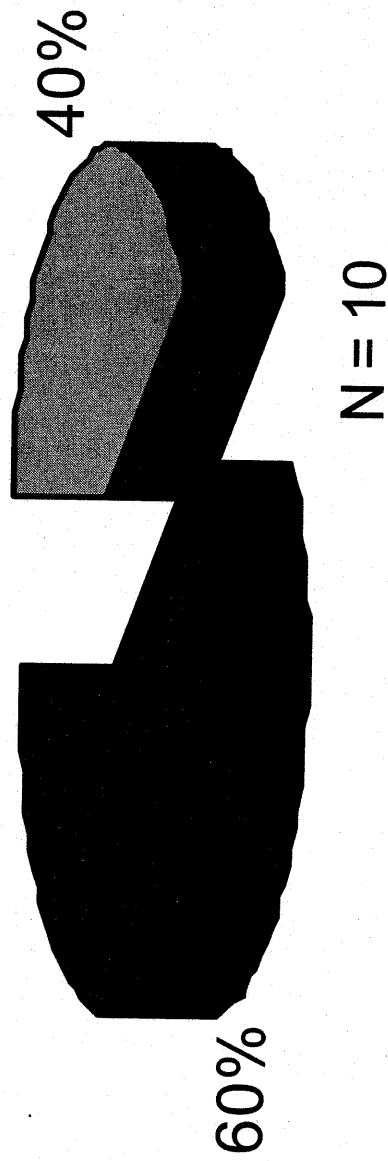


# Operational Trial Manual Intervention For Status



# Operational Trial Pending Orders

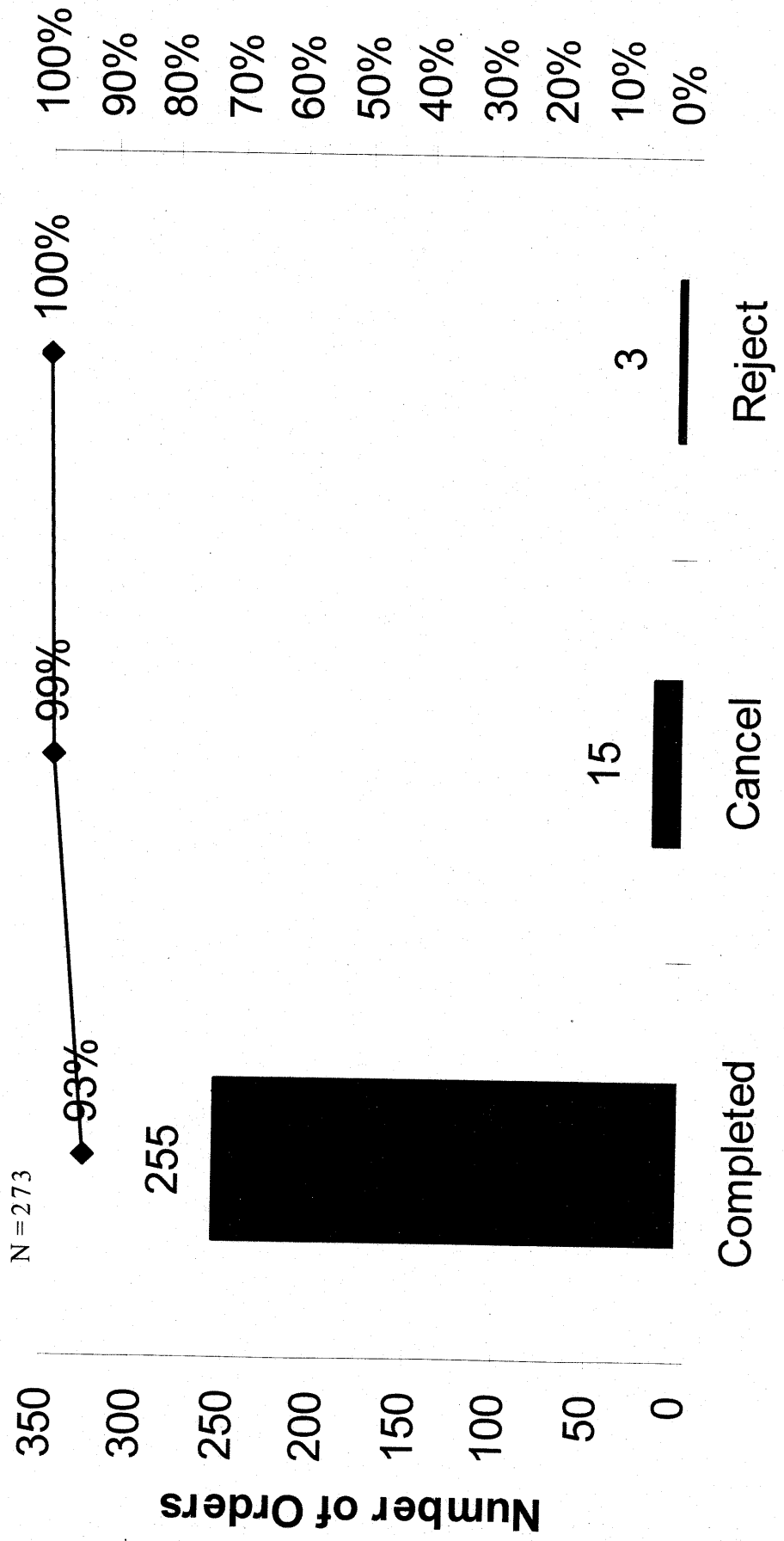
(As Of 10/27/97)



■ Pending ■ Canceled

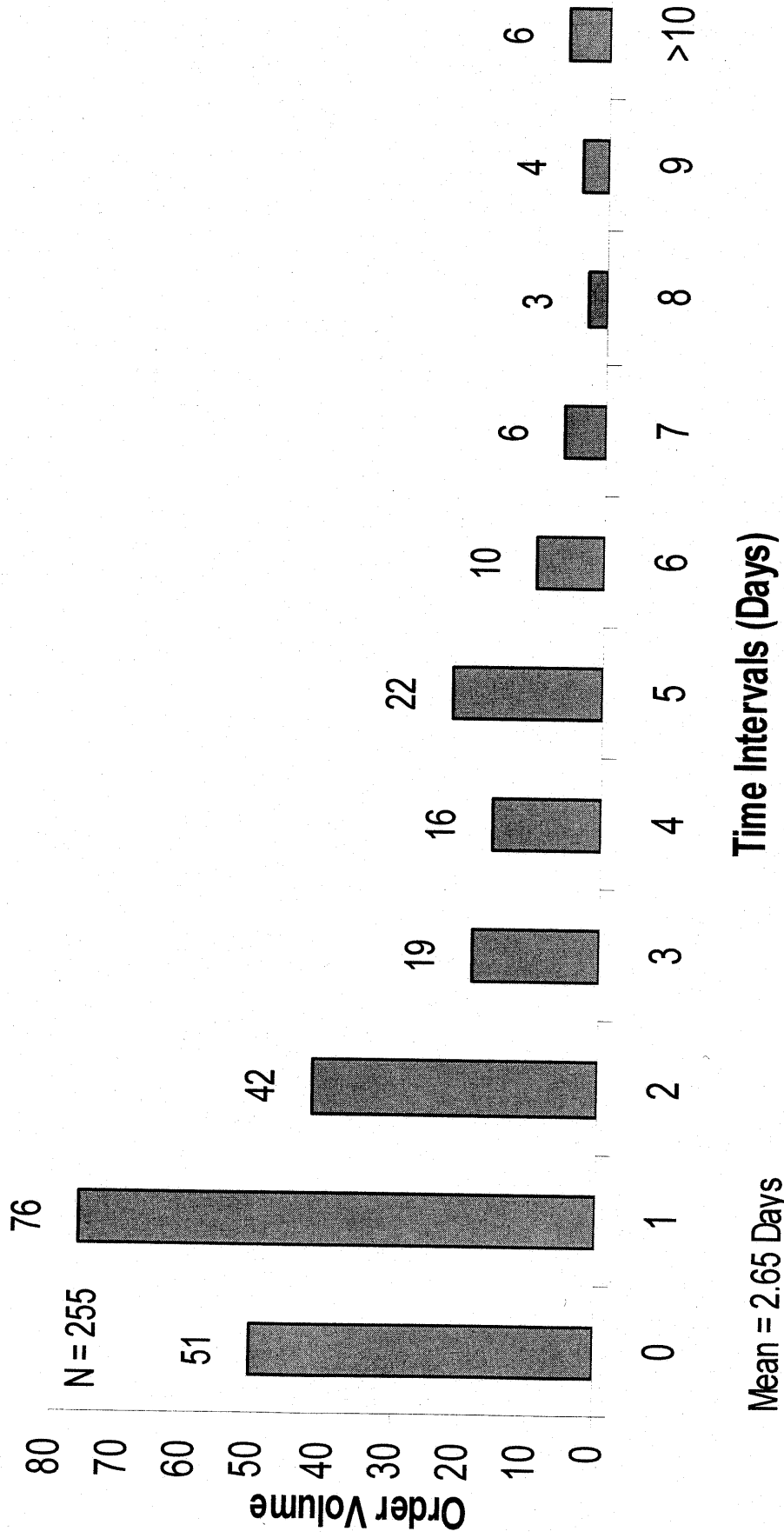
# Migrate-As-Is

## Order Status



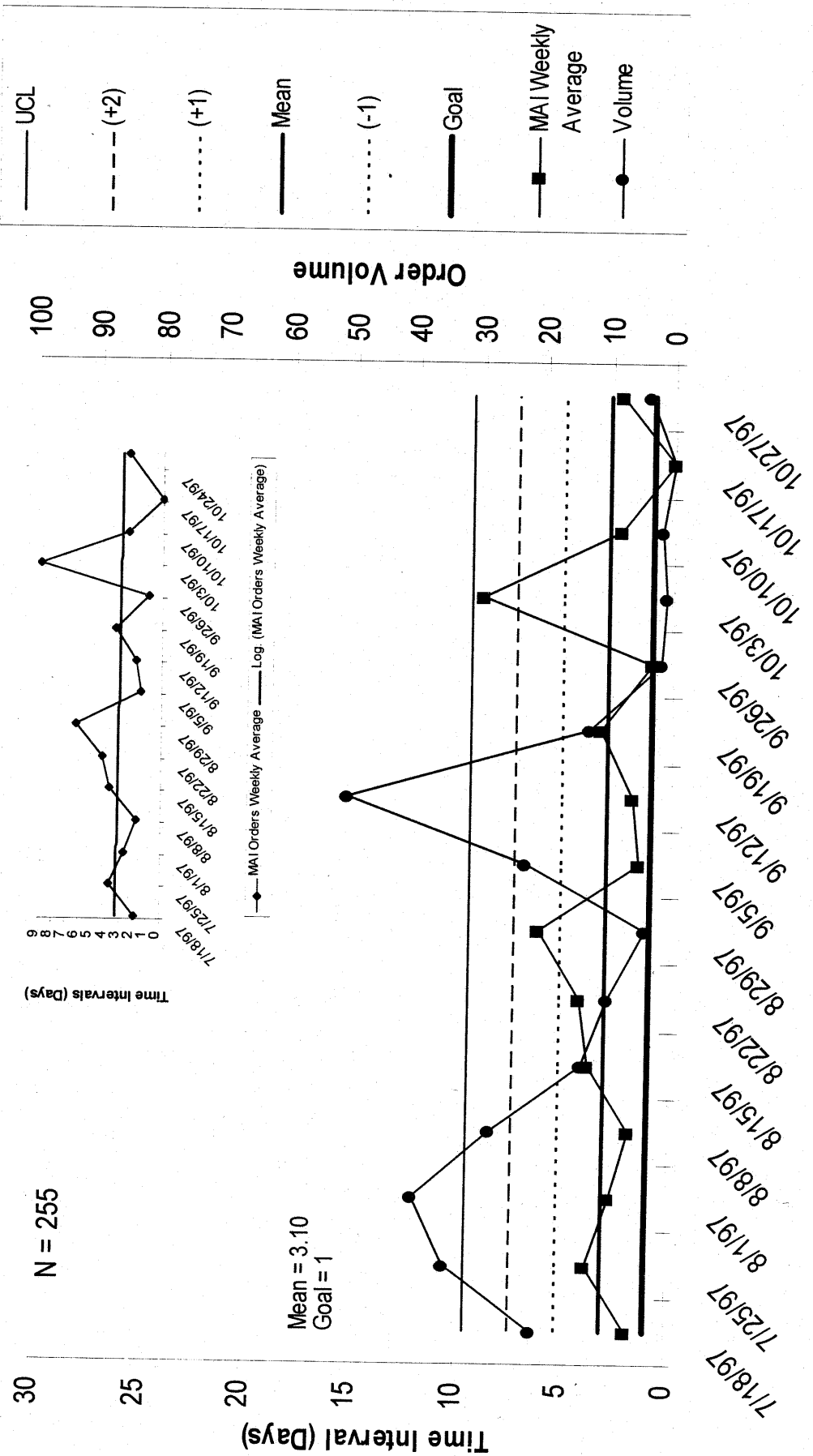
# Migrate-As-Is

## Order Completion Intervals



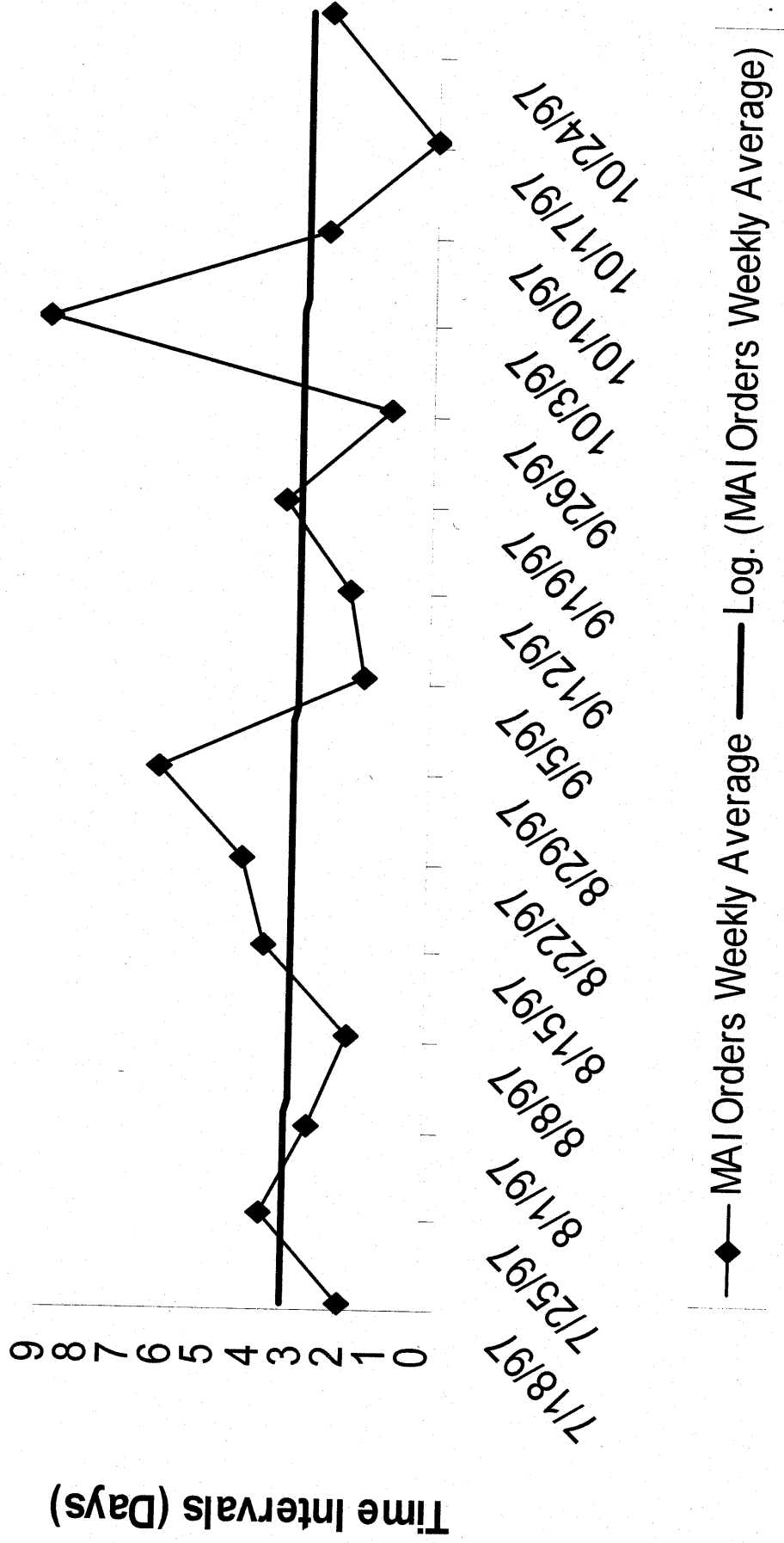
# Migrate-As-Is

## Weekly Average Order Completion Intervals



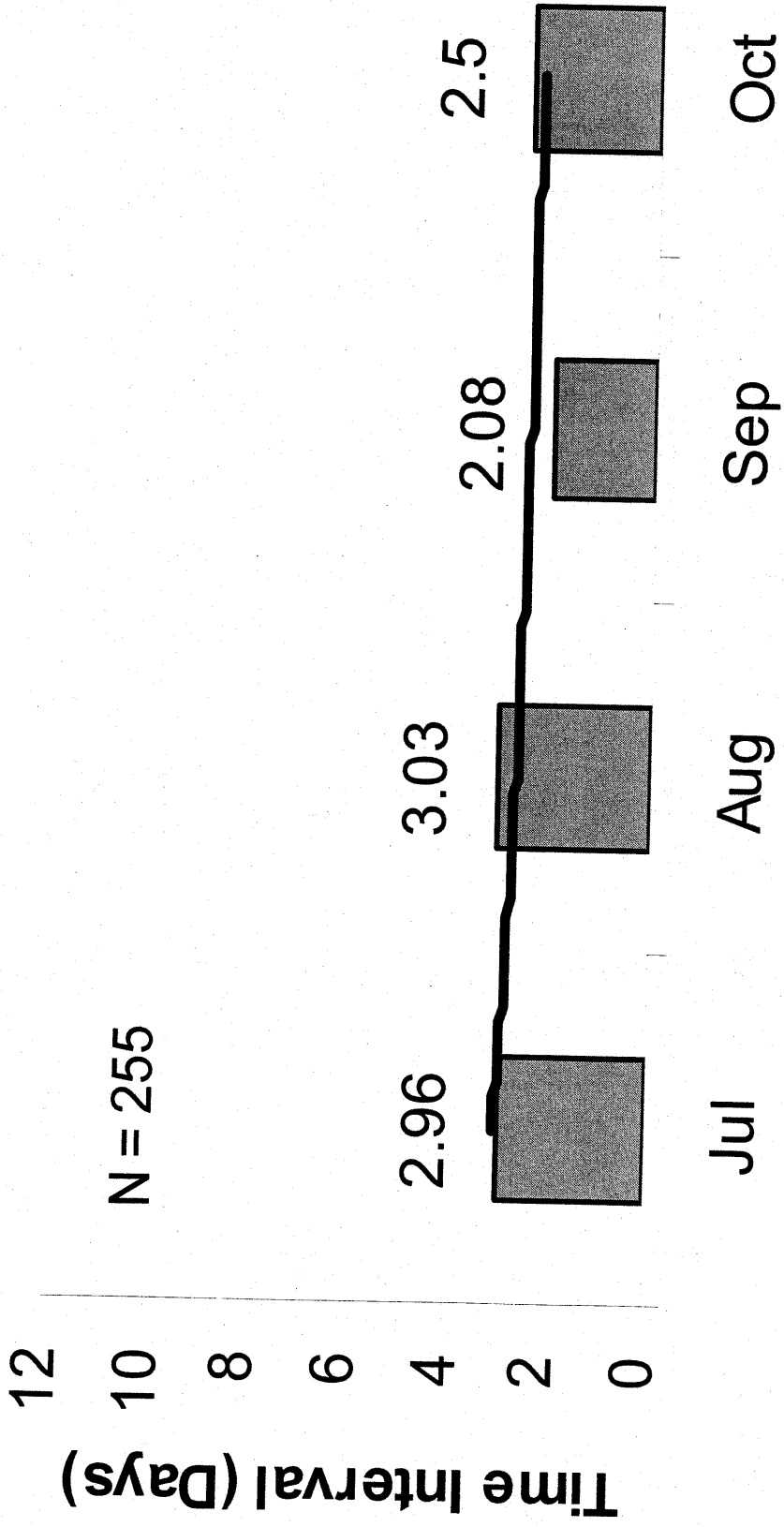
# Migrate-As-Is

## Weekly Average Order Completion Interval Trends



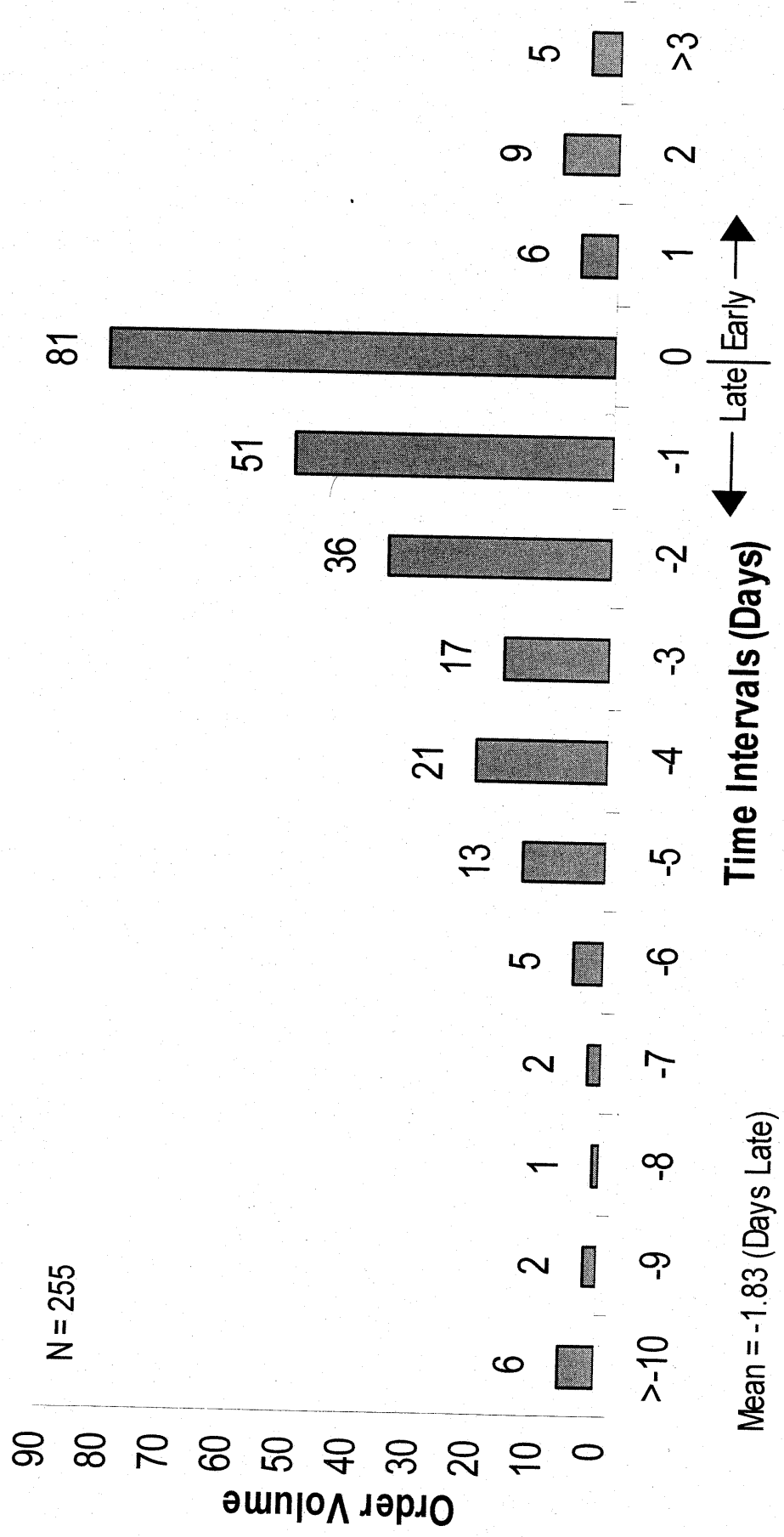
# Migrate-As-Is

## Monthly Average Order Completion Interval Trends



# Migrate-As-Is

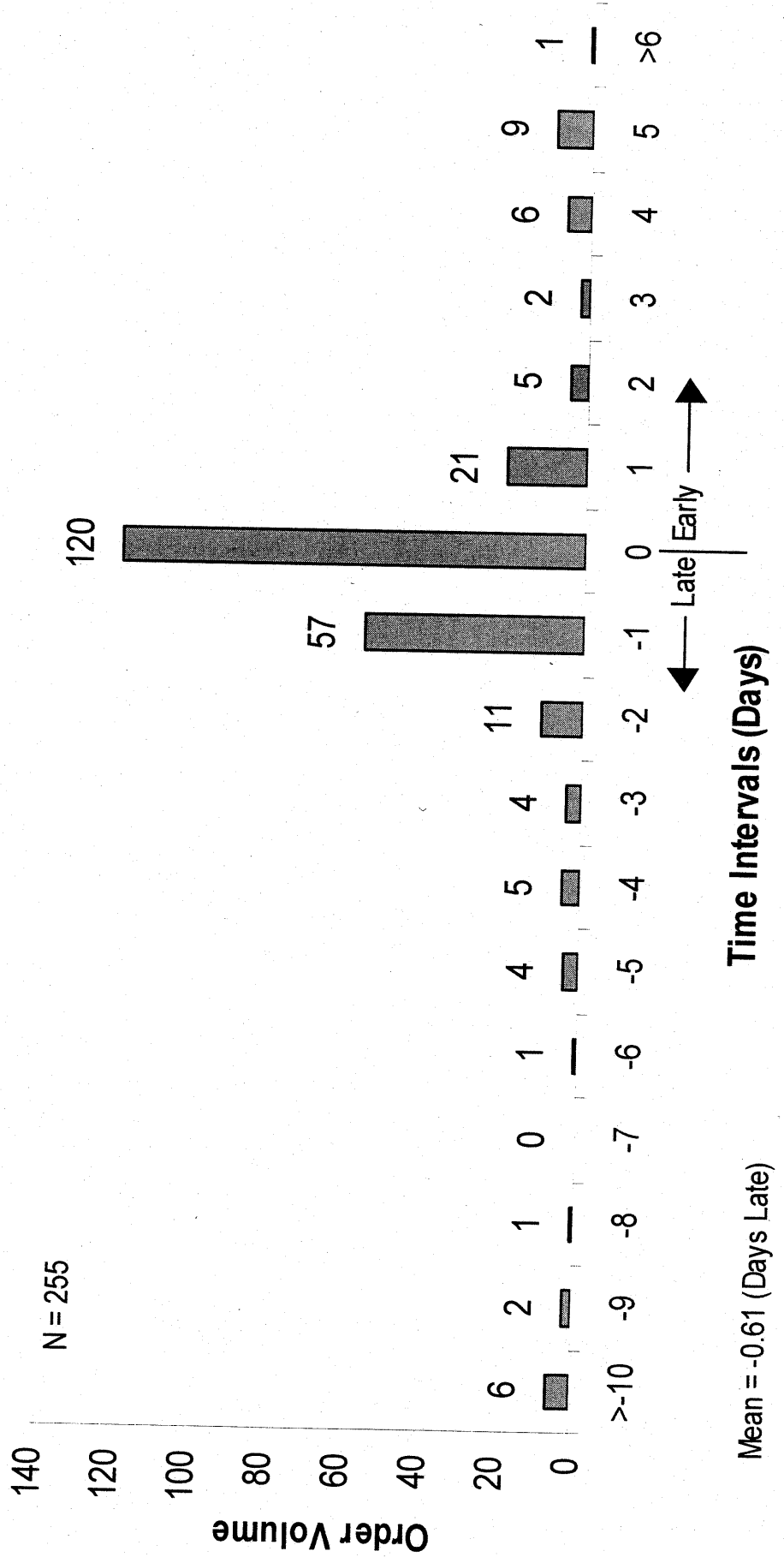
## Desired Due Date To Order Completion Interval





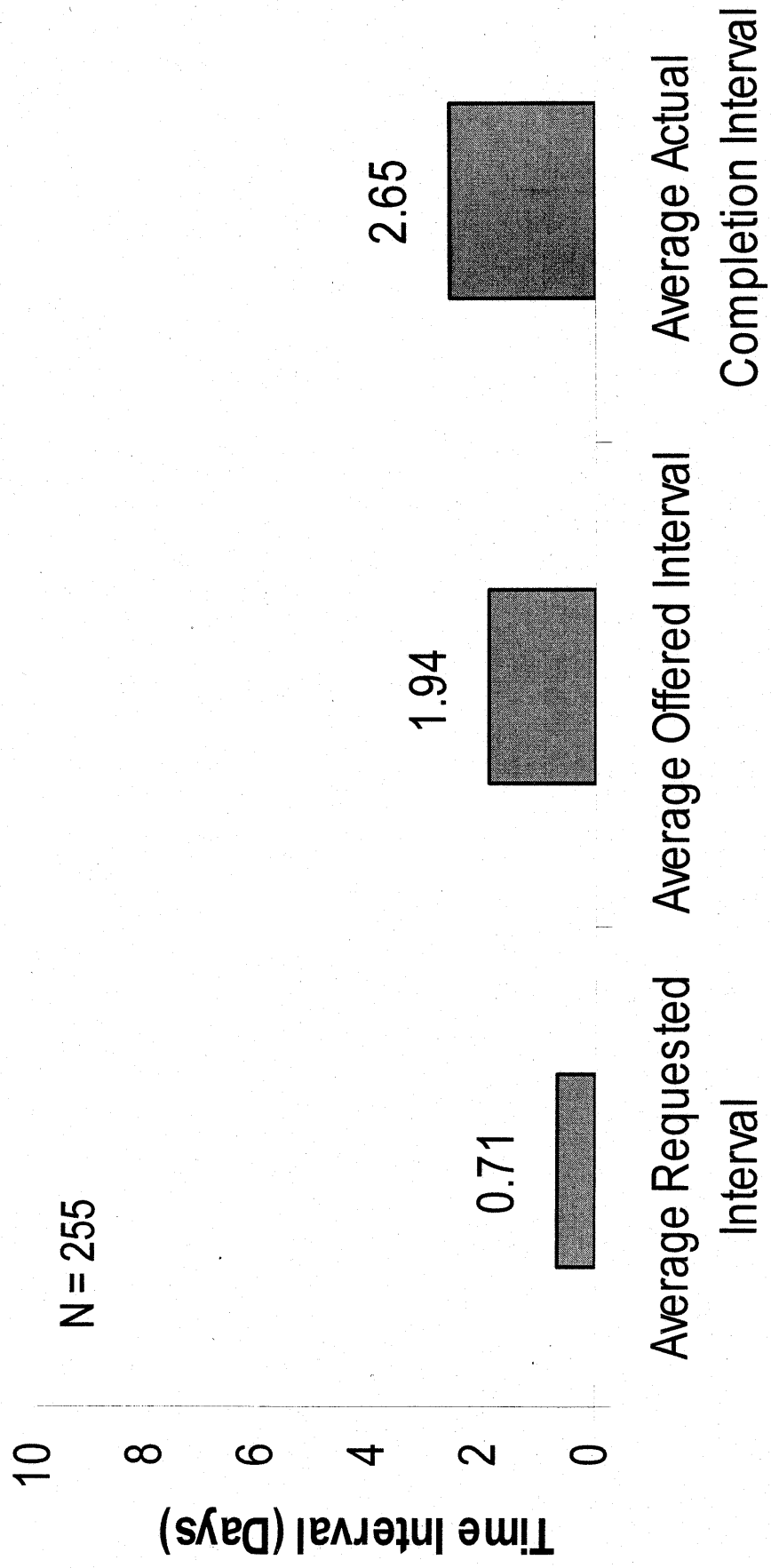
# Migrate-As-Is

## Firm Order Confirmation To Order Completion Intervals



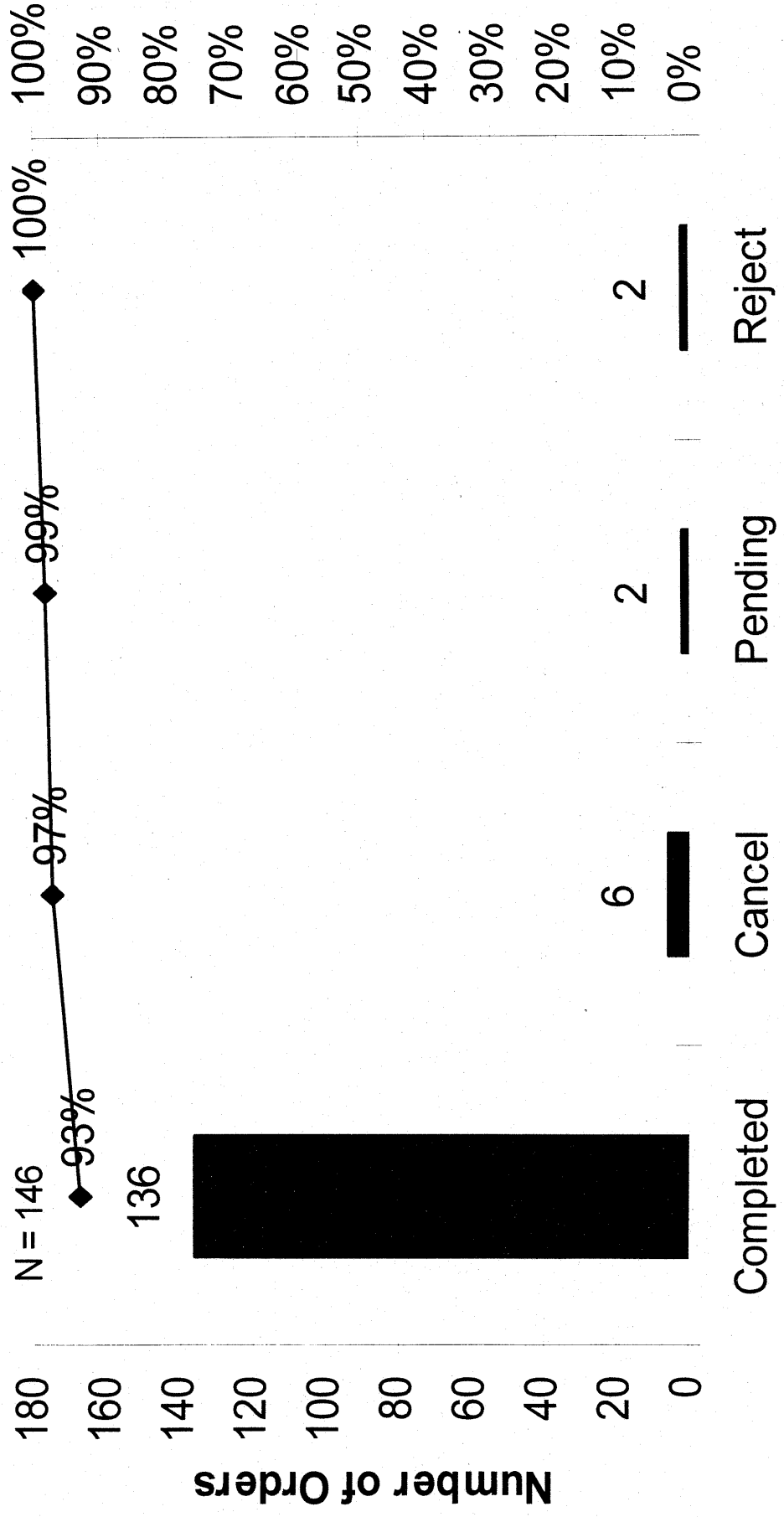
# Migrate-As-Is

## Interval Comparisons

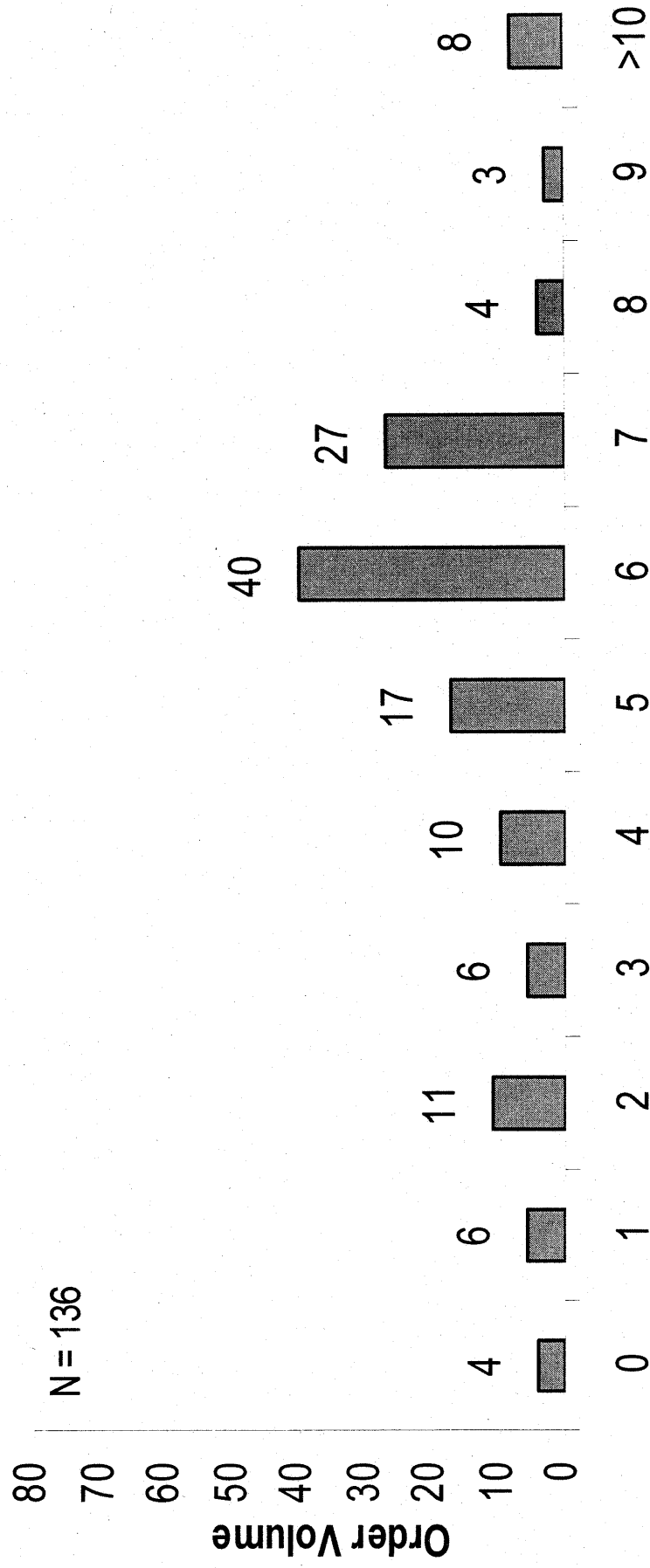


# Migrate-As-Specified

## Order Status



# Migrate-As-Specified Order Completion Intervals

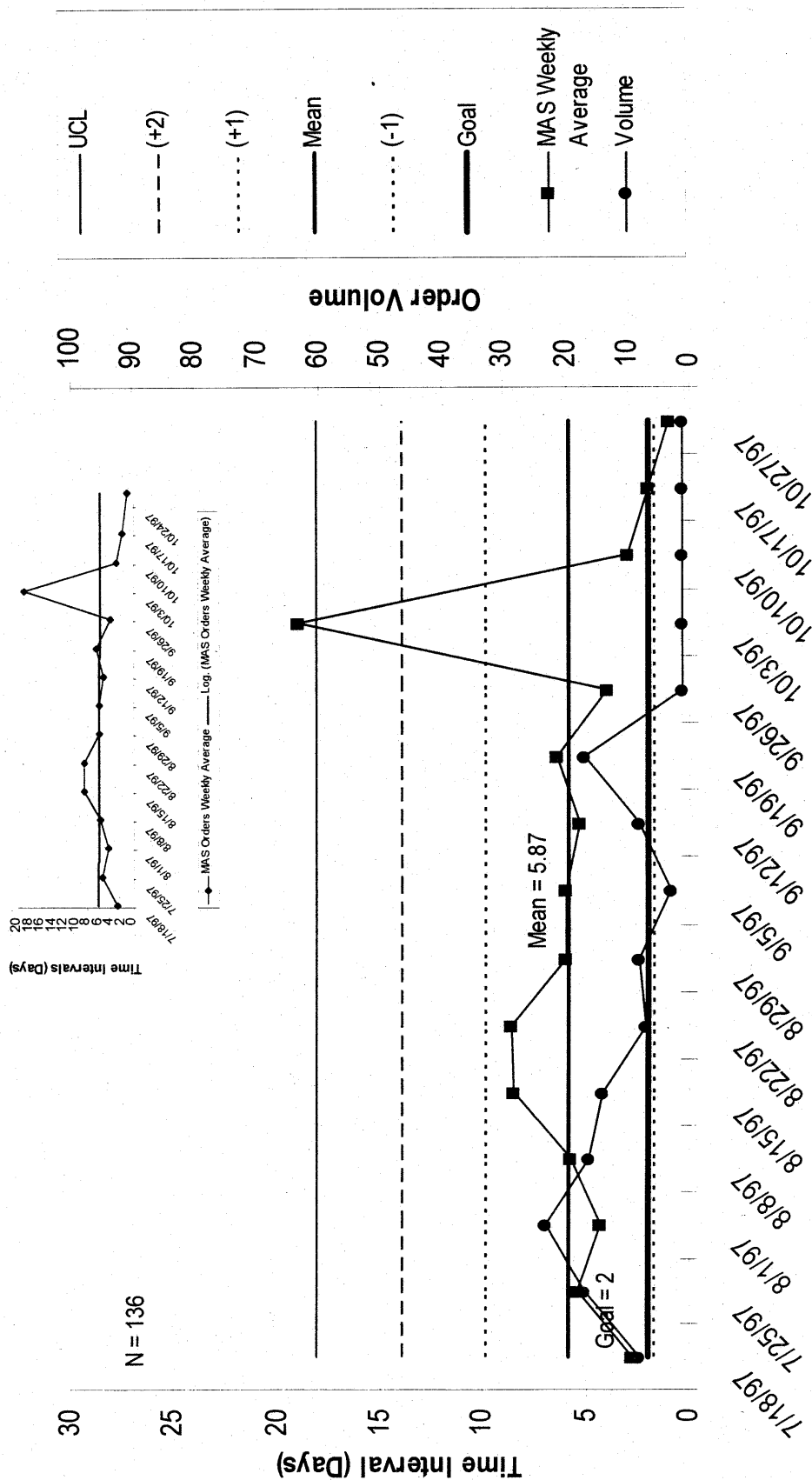


Mean = 5.79 Days

Time Intervals (Days)

# Migrate-As-Specified

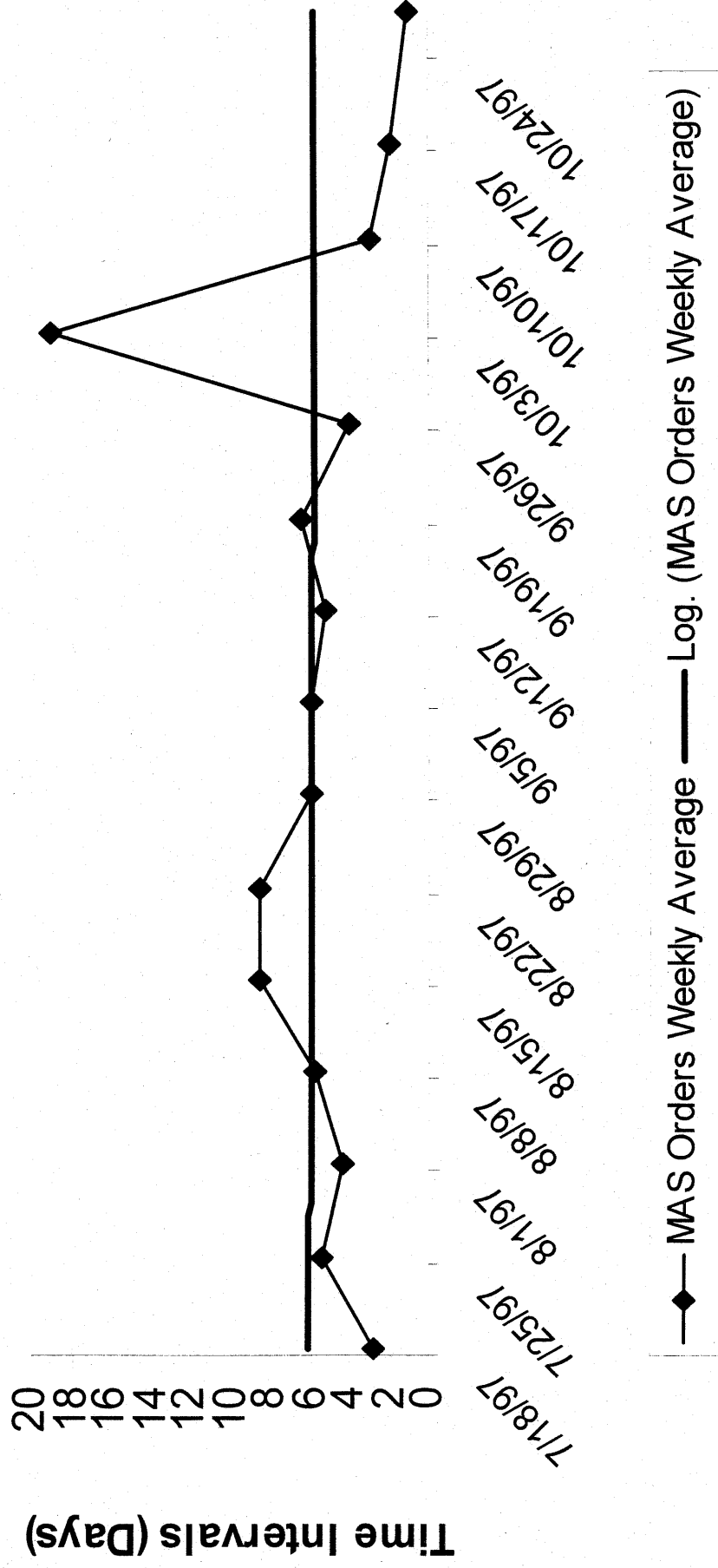
## Weekly Average Order Completion Intervals



# Migrate-As-Specified

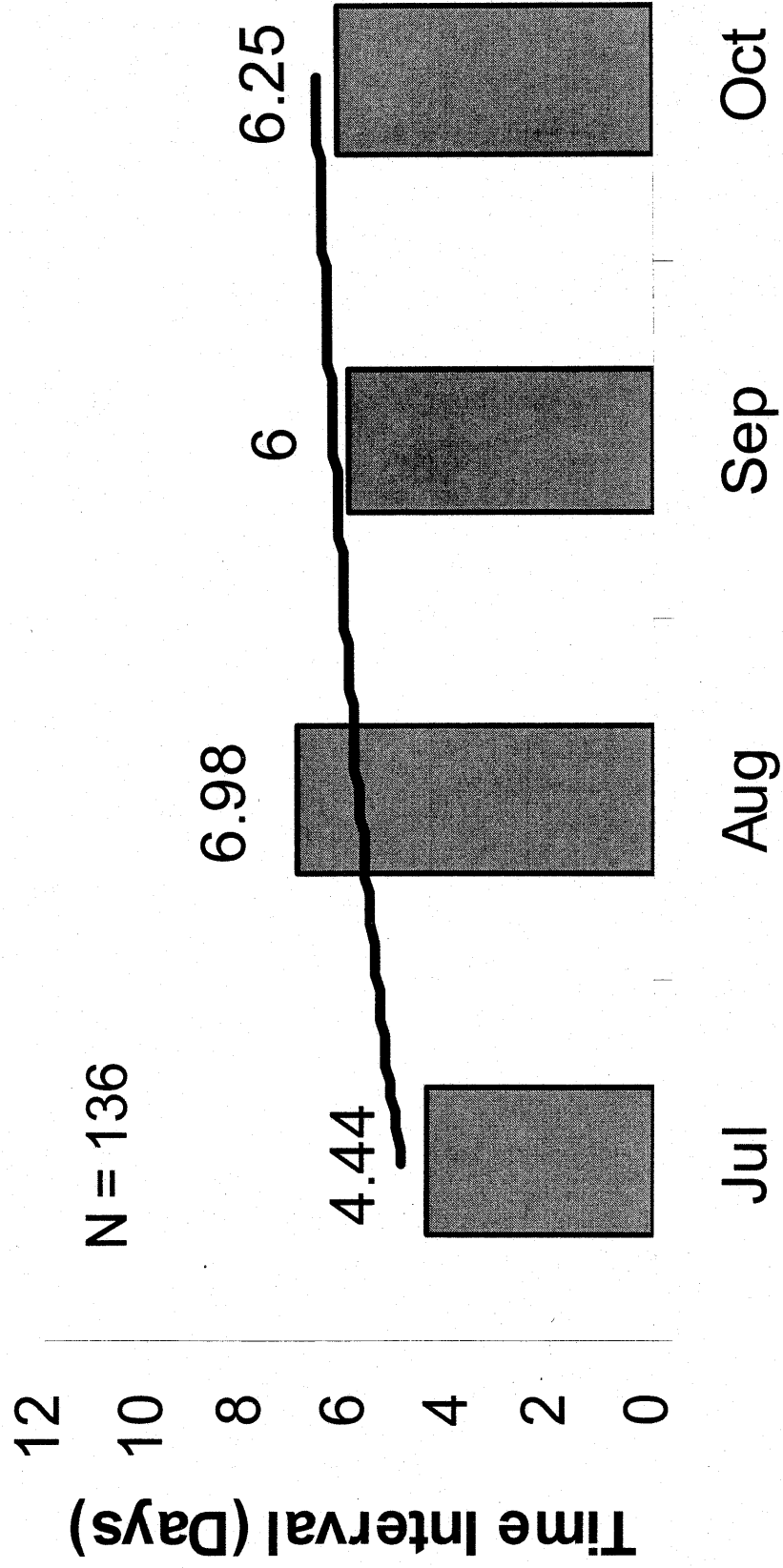
## Weekly Average Order Completion Interval

### Trends



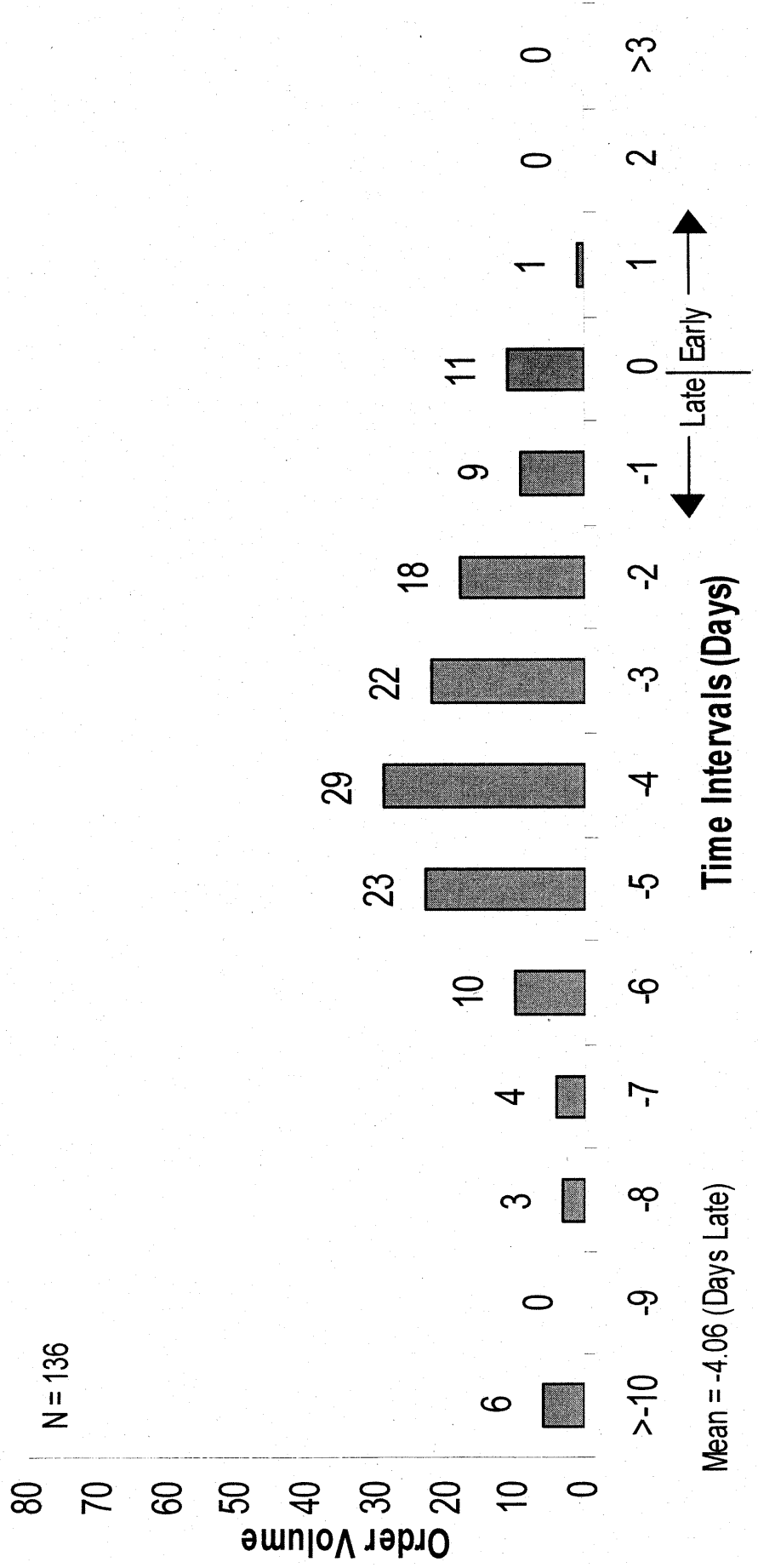
# Migrate-As-Specified

## Monthly Average Order Completion Interval Trends



# Migrate-As-Specified

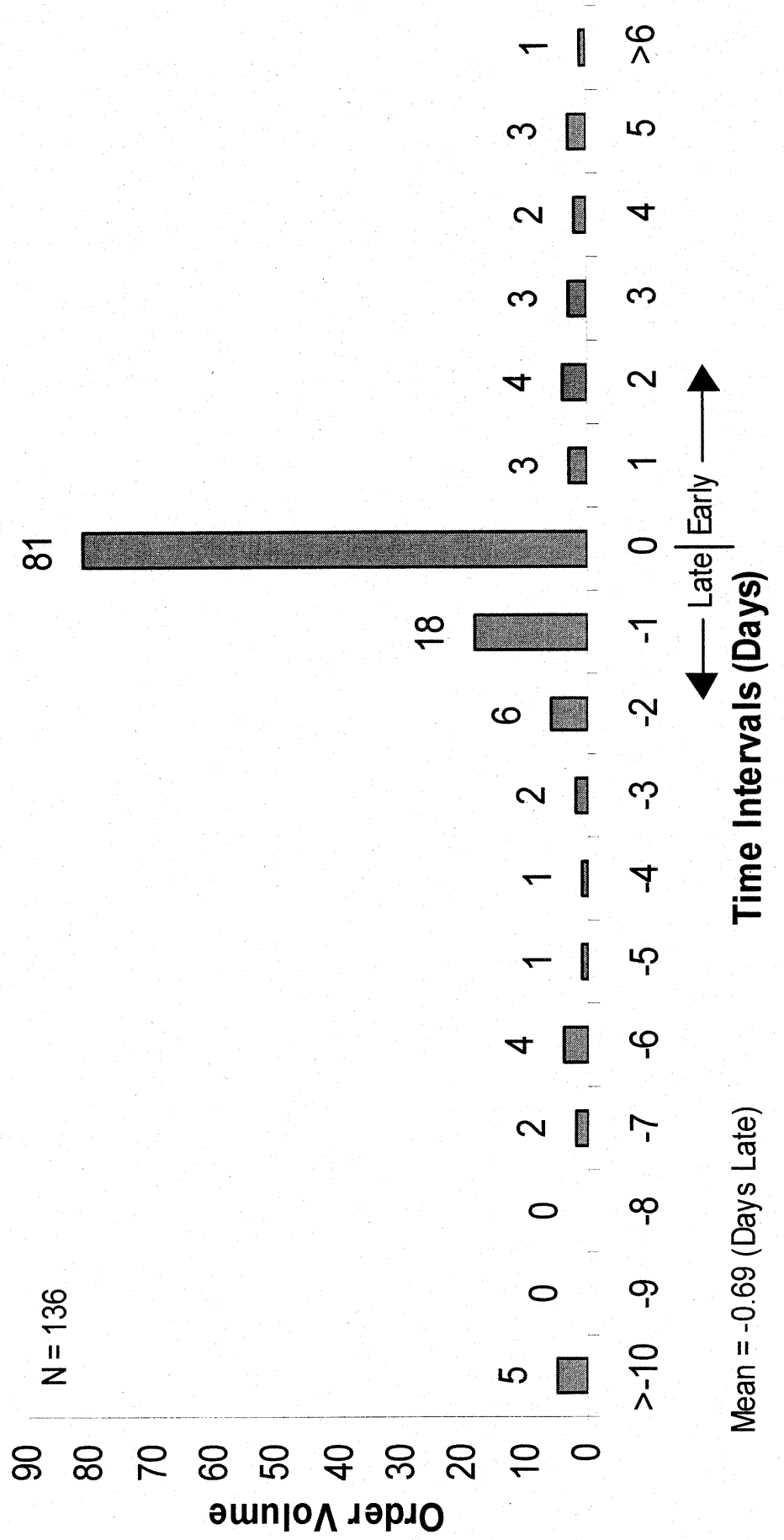
## Desired Due Date To Order Completion Intervals



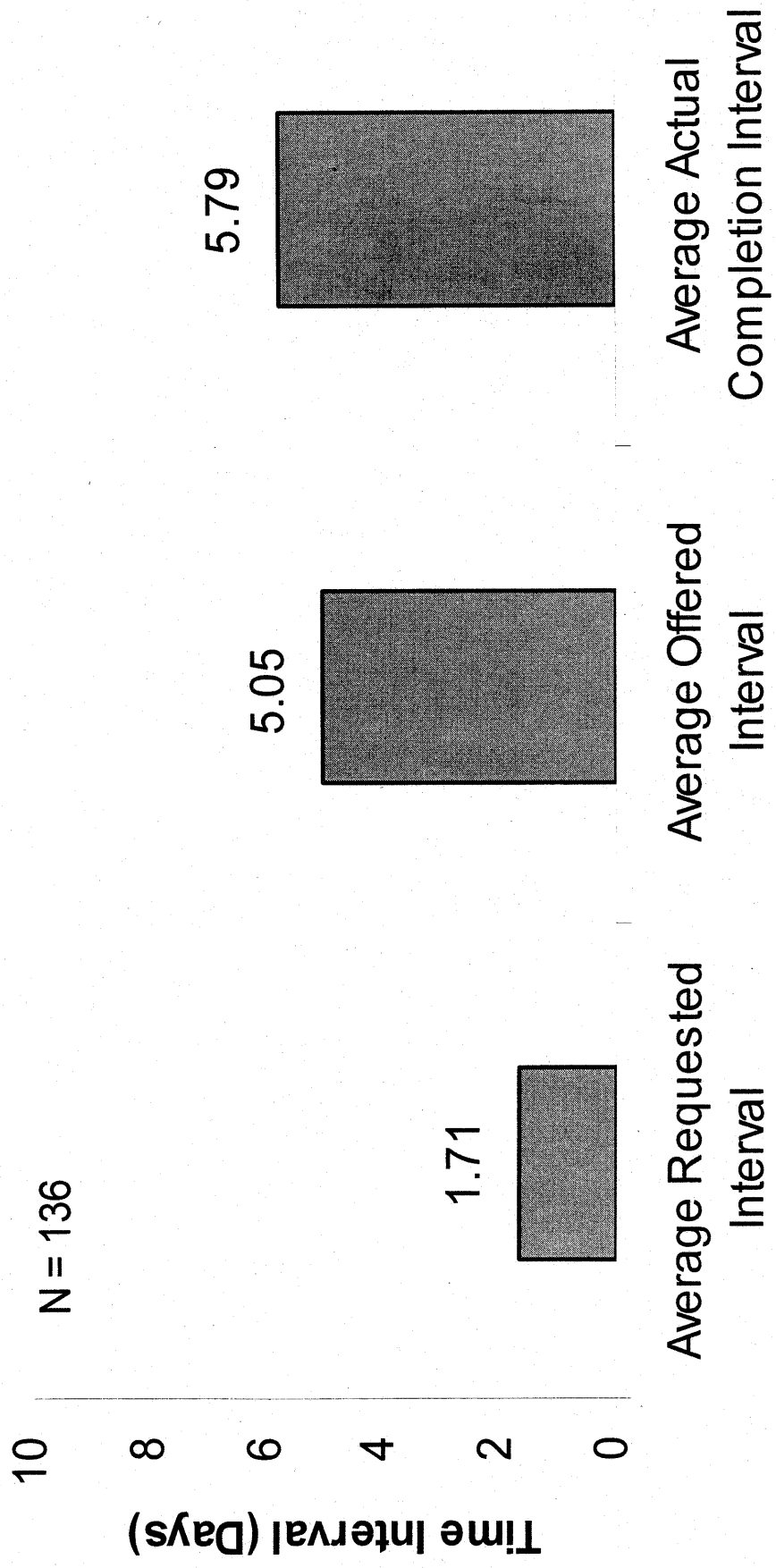


# Migrate-As-Specified

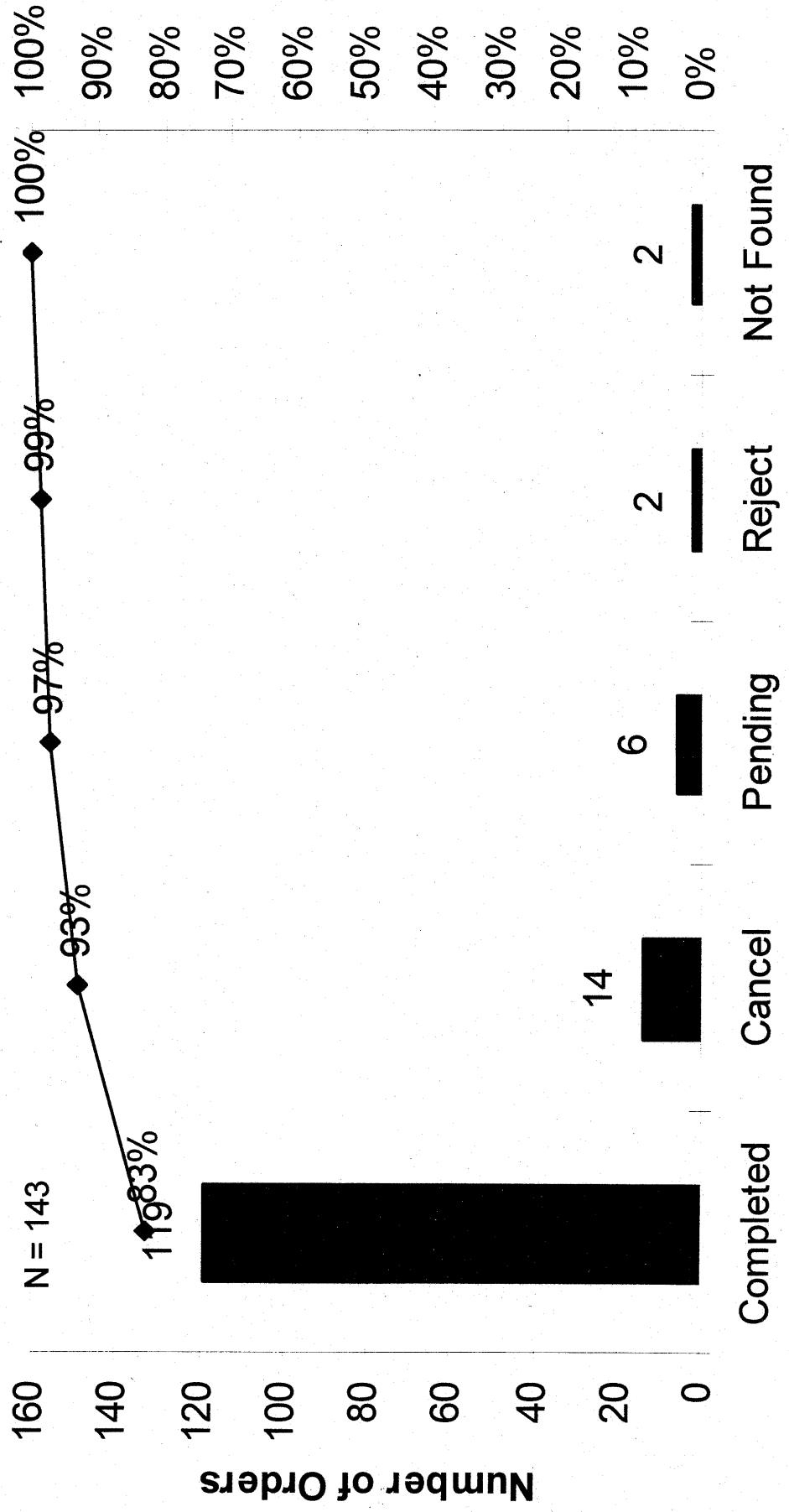
## Firm Order Confirmation To Order Completion Intervals



# Migrate-As-Specified Interval Comparisons

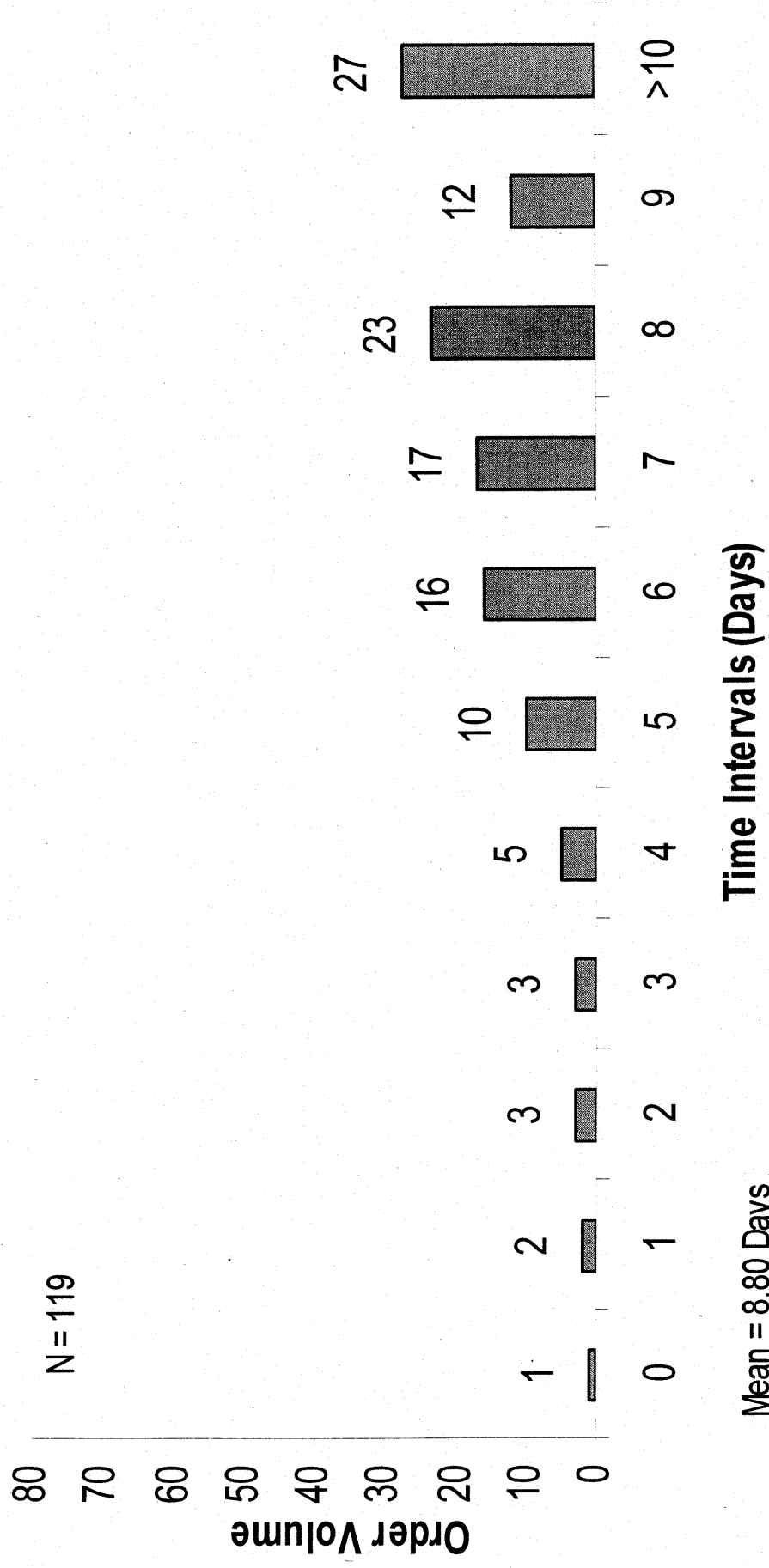


# New Install Order Status



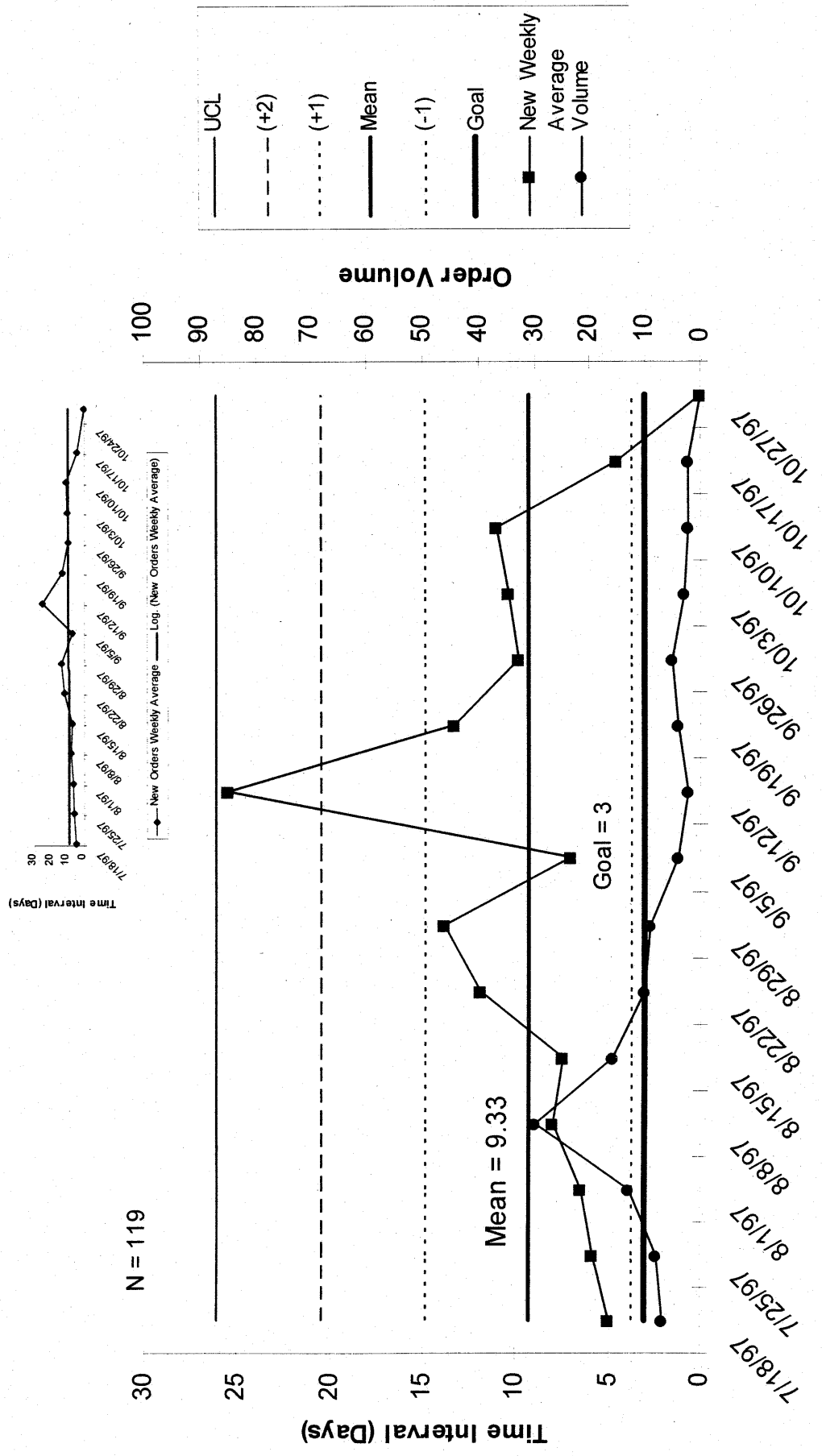
# New Install

## Order Completion Intervals



# New Install

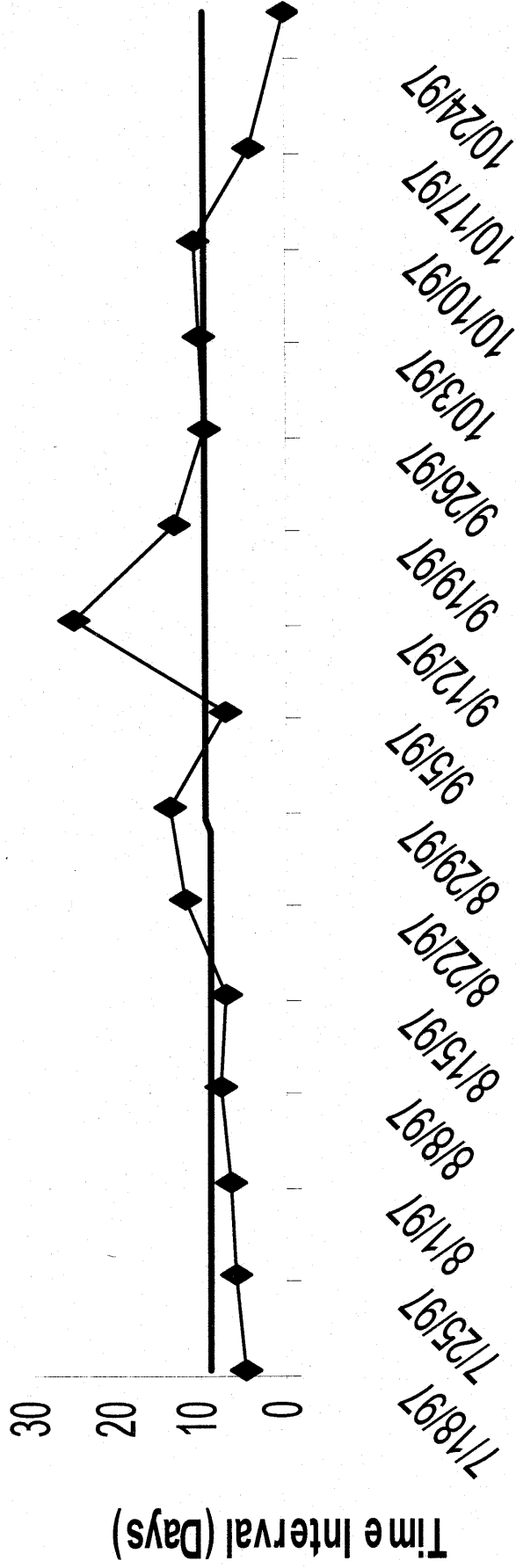
## Weekly Average Order Completion Intervals



# New Install

## Weekly Average Order Completion Interval

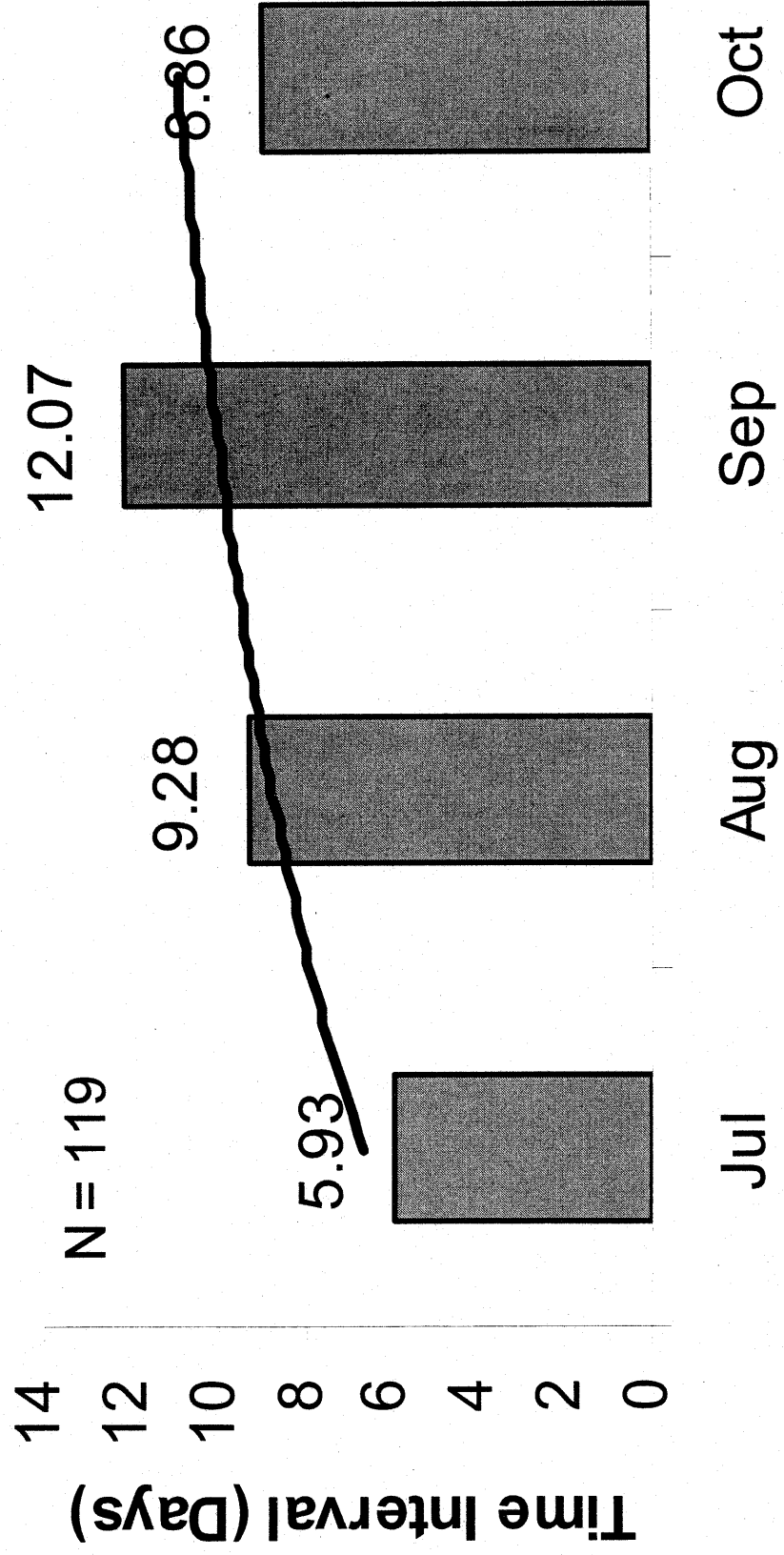
### Trend



—◆— New Orders Weekly Average — Log. (New Orders Weekly Average)

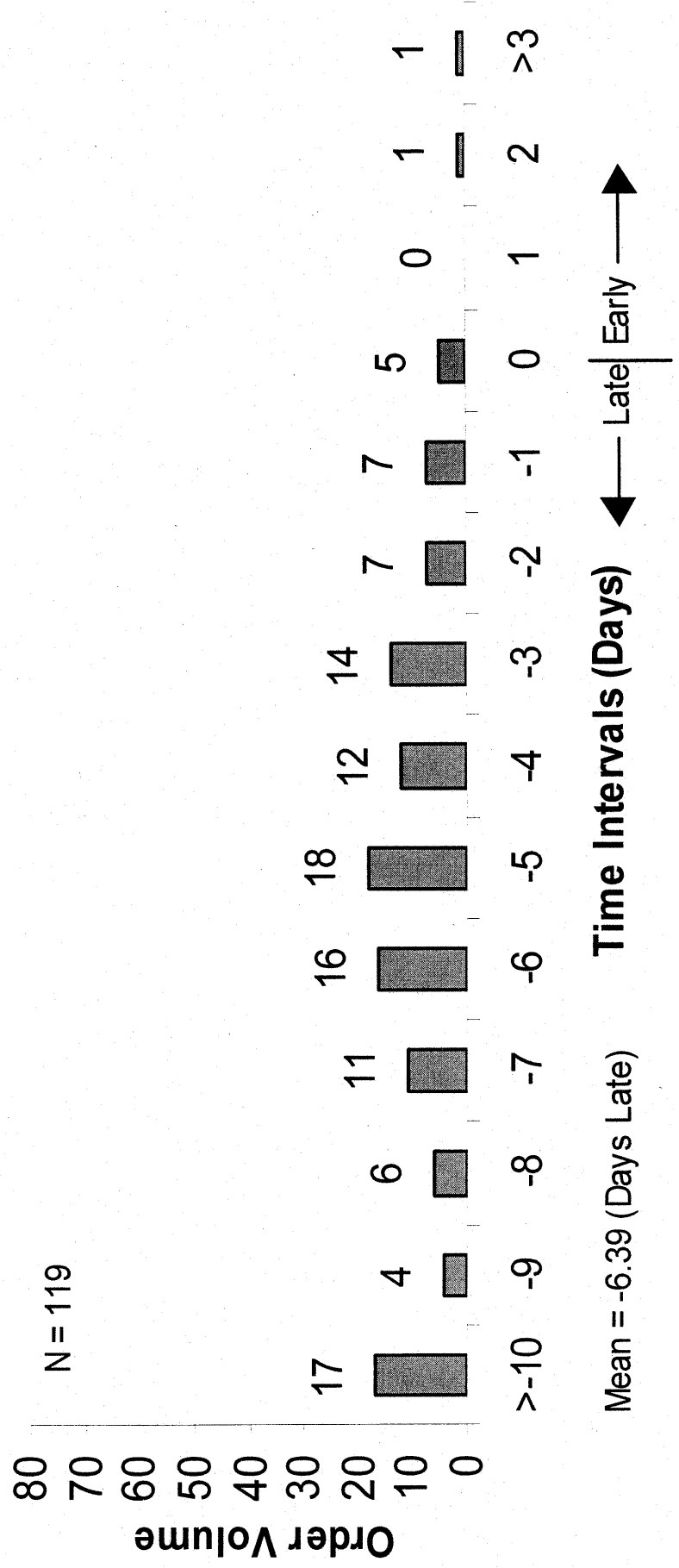
# New Install

## Monthly Average Order Completion Interval Trends



# New Install

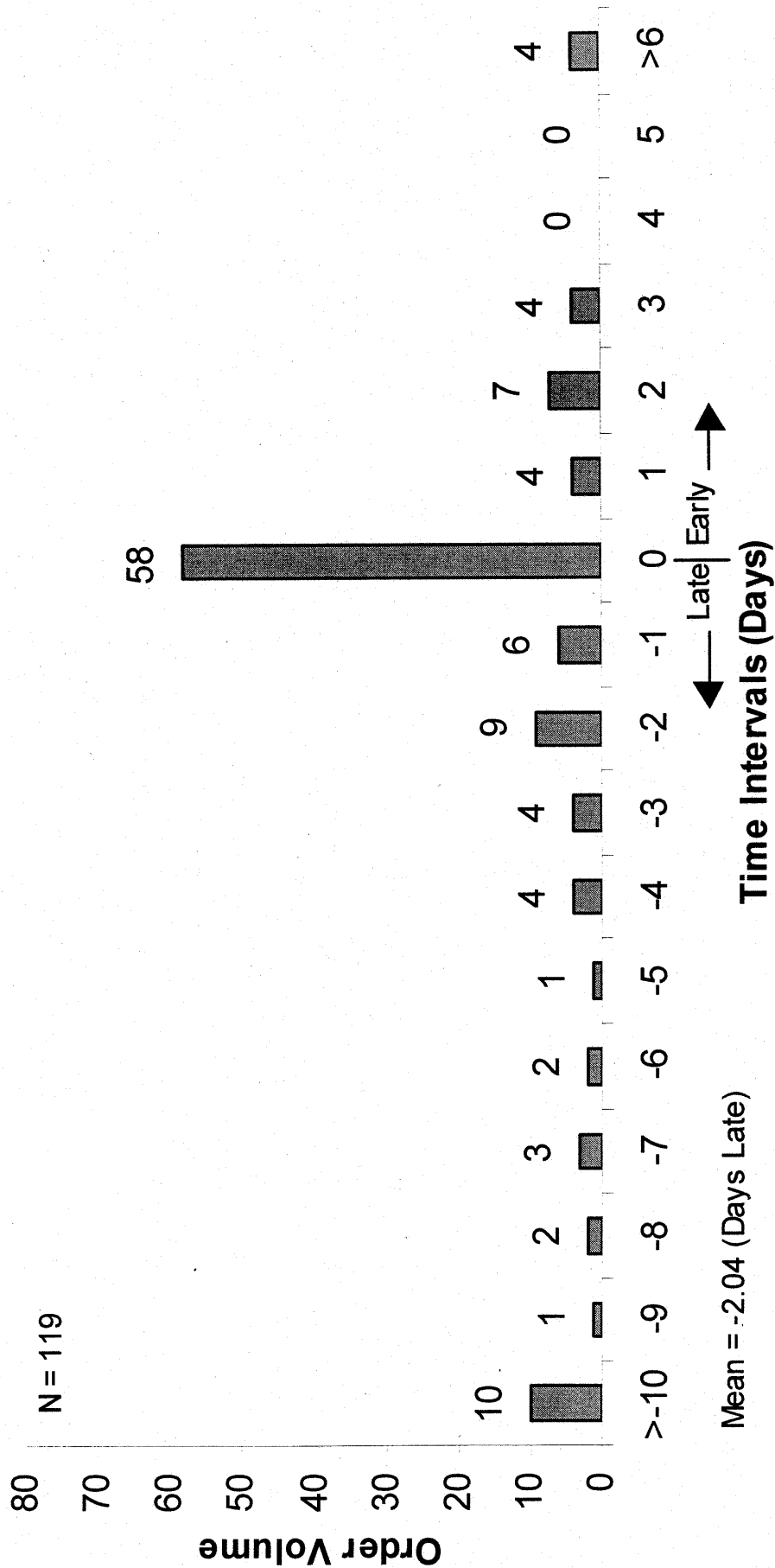
## Desired Due Date To Order Completion Intervals



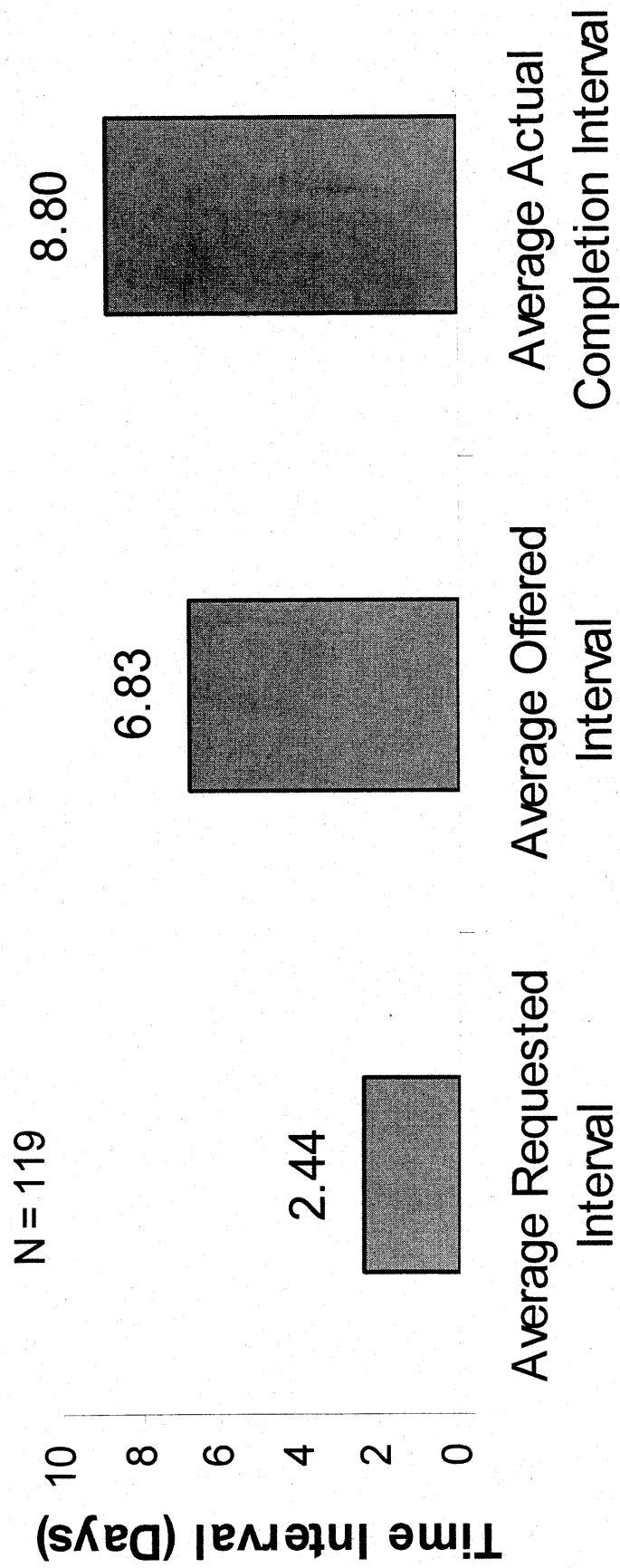


# New Install

## Firm Order Confirmation To Order Completion Intervals



# New Install Interval Comparisons



## Analysis of MM and BM Ops Trials Orders to TN

MM Resale		April	June	Aug	Total
Migrates	Orders Submitted	8.0	2.0		10.0
	Received FOC	8.0	2.0		10.0
	Avg FOC Intrvl	4.0	0.5		3.3
	Rec'd Due Date	8.0	2.0		10.0
	Avg DD Intrvl	4.8	2.0		4.2
	Rec'd Completes	0.0	0.0		0.0
New	Orders Submitted	4.0		1.0	5.0
	Received FOC	4.0		1.0	5.0
	Avg FOC Intrvl	4.0		1.0	3.4
	Rec'd Due Date	4.0		1.0	5.0
	Avg DD Intrvl	4.8		4.0	4.6
	Rec'd Completes	0.0		0.0	0.0
TOTAL	Orders Submitted	12.0	2.0	1.0	15.0
	Received FOC	12.0	2.0	1.0	15.0
	Avg FOC Intrvl	4.0	0.5	1.0	3.3
	Max FOC	4.0	1.0	1.0	4.0
	Min FOC	4.0	0.0	1.0	0.0
	Rec'd Due Date	12.0	2.0	1.0	15.0
	Avg DD Intrvl	4.8	2.0	4.0	4.3
	Max DD	5.0	2.0	4.0	5.0
	Min DD	4.0	2.0	4.0	2.0
	Rec'd Completes	0.0	0.0	0.0	0.0

BM Resale		Sep	Oct	Nov	Total
	Orders Submitted	2.0	11.0	1.0	14.0
	Received FOC	2.0	9.0	1.0	12.0
	Avg FOC Intrvl	3.0	4.0	2.0	3.7
	Max FOC	4.0	12.0	2.0	12.0
	Min FOC	2.0	-	2.0	-
	Rec'd Due Date	2.0	10.0	1.0	13.0
	Avg DD Intrvl	5.5	6.8	5.0	6.5
	Max DD	6.0	16.0	5.0	16.0
	Min DD	5.0	2.0	5.0	2.0
	Rec'd Completes	1.0	8.0	-	9.0
	Avg Complete Intrvl	17.0	15.8	-	15.9
	Max Complete	17.0	24.0	-	24.0
	Min Complete	17.0	8.0	-	-
	No Responses	-	2.0	-	2.0

BM NP-1		OCT
	Orders Submitted	15.0
	Received FOC	15.0
	Avg FOC Intrvl	1.1
	Max FOC	2.0

Min FOC	1.0
Rec'd Due Dates	14.0
Avg DD Intrvl	8.0
Max DD	8.0
Min DD	8.0
Rec'd Completes	7.0
Avg Complete Intrvl	8.0
Max Complete	8.0
Min Complete	8.0

**SUPPLEMENTAL RESPONSE TO DATA REQUEST  
NO. 8**

**Alan Anglyn**

**From:** Judy.Rueblinger1@bridge.bellsouth.com  
**Sent:** Monday, January 19, 1998 9:20 AM  
**To:** alan.anglyn@mci.com; Beth.G.Craig@bridge.bellsouth.com;  
Lynnette.Futch@bridge.bellsouth.com  
**Cc:** helen.arthur@mci.com; Clifford.H.Bowers@bridge.bellsouth.com;  
Kelli.Burgess@bridge.bellsouth.com; Sharon.R.Daniels@bridge.bellsouth.com;  
bryan.green@mci.com  
**Subject:** LNP Action Items - From 1/15/98 Conference Call

Listed below are the action items I have noted from our 1/15/98 LNP conference call. If I have incorrectly stated or omitted anything please let me know.

Thanks,

Judy

LNP Conference Call - 1/15/98

**ACTION ITEMS**

1. BST needs MCI's requirements. Joan/Terri will send to Alan. Alan will send to Judy.
2. Beth advised MCI would not get Completion Notification (CN) for LNP requests because MCI would be doing the work. The question was asked, "What about loop w/LNP?". Beth advised it was her understanding from LOC conference that CN was not needed. MCI advised they need CN on unbundled loop with LNP. Beth will check into this.\*
3. Beth advised can send one LSR with Loop, LNP and Directory Listing. Multiple LSRs is too much work.

In the CLEC Ordering Guide, Local Interconnection and Facility Based Ordering Forms Matrix, it is noted that the Directory Listing Form is prohibited when ordering a Loop.

If it can be done when ordering LNP why can't MCI submit one LSR for Loop and DLR (without LNP)?

Kelli Burgess is investigating this.

4. What is BellSouth's commitment on Functional Acknowledgments (FAs), Rejects, Firm Order Confirmations (FOCs) and Completion Notices (CNs) for LNP requests? Beth will investigate.\*
5. Beth advised that LNP orders don't go through LEO and LESOG. MCI would to know what route the order takes. Judy to work with Beth to develop a flow for LNP requests.

\*Beth advised will need some time to work with her team on these items. Alan advised will track progress/status through Account Team.

## **Beverly Gordon**

---

**From:** Bryan K. Green [Bryan.Green@mci.com]  
**Sent:** Tuesday, November 25, 1997 4:55 PM  
**To:** 'Alan Anglyn [Alan.Anglyn@MCI.Com] (E-mail)'; 'Anna Hopkins [Anna.Hopkins@MCI.Com] (E-mail)'; 'Arthur, Helen (MCI)'; 'Beverly Gordon (E-mail)'  
**Subject:** FW: Change Management/RSAG/CGI

FYI,

Beverly please file accordingly.

Bryan

-----Original Message-----

**From:** Clifford H. Bowers [SMTP:Clifford.H.Bowers@bridge.bst.bls.com]  
**Sent:** Tuesday, November 25, 1997 4:23 PM  
**To:** Bryan Green  
**Cc:** Randy M. Kinkaid; Pamela K. Lee; Judy Rueblinger; Bob Siegel  
**Subject:** Change Management/RSAG/CGI

Bryan,

Here's some additional information that has been provided to me related to your questions yesterday regarding plans/status for Change Management, RSAG, and CGI.

\* **Change Management:** BST's change management plan will be ready for CLEC comments and input in mid - December. This will not be the final plan but will be a strawman that includes MCI's as well as other CLECs' input. The initial plan that is developed as a result of this process will not be the final plan. Instead, we expect our change management plan to evolve and change as necessary to meet the ongoing needs of our customers and BST. At this time we anticipate meetings to review our change management strawman to take place on an individual basis with each interested CLEC. However, that has not been finalized. The presentations of our plan will be made by representatives from our OSS product/project teams. We hope to offer you specific dates for the meeting with you sometime during the week of 12/1/97. All areas that you identified in your desired change management plan as possibly impacting your systems are being reviewed and considered.

\* **RSAG:** I have confirmed that we will send you on Monday 12/1/97, cost estimates for providing MCI extracts from RSAG of the data necessary to perform address validations.

\* **CGI:** The list of enhancements for release 1.1 is still not available and no specific date has been set as to when they can be provided. I will follow up next week on this.

Please let me know if you have any questions.

Thanks,

Cliff

**FILE COPY**

**DISTRIBUTED**

11/20

**BELLSOUTH**

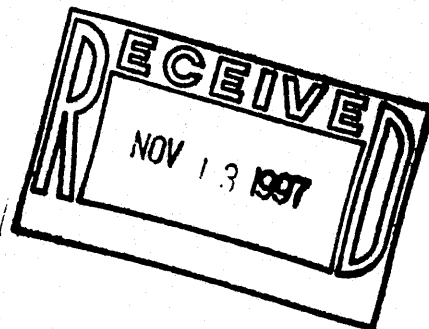
BellSouth Telecommunications, Inc.  
Suite 4511  
675 West Peachtree Street, N.E.  
Atlanta, Georgia 30375

404 927-7020  
Fax 404 521-2311

Mark L. Feldler  
President - Interconnection Services

November 13, 1997

Mr. Marcel Henry  
Regional Vice President  
Southern Financial Operations  
MCI Telecommunications  
Three Ravinia Drive  
Atlanta, Georgia 30346



Dear Marcel:

Recently, you brought to the attention of the BellSouth MCI Account Team your concerns over MCImetro's ("MCI") perceived lack of progress on several MCImetro OSS issues, including Change Management, Loss Notification/NDM, RSAG, and Common Graphical Interface (CGI). We then discussed these items on the phone last week. I am now in a position to provide you with an update.

At present, BellSouth is in compliance with the interface obligations and interface duties set forth in the MCImetro/BellSouth Interconnection agreements. The OSS requirements were negotiated between the parties and are contained within Attachment VIII of the Interconnection Agreements. In that Attachment you will find that MCI agreed to accept, on an interim basis, the interfaces approved by BellSouth.

I want to assure you that BellSouth has been very focused in its quest to meet the additional requests from MCI. The outstanding MCI requests are complex and BellSouth must make sure that the responses are fully researched and as correct and current as possible. To ensure MCI understands where BellSouth stands on these issues, I have summarized below their current status and BellSouth's plans for addressing each one.

- **Change Management:** BellSouth is in the process of developing a change management plan. BellSouth appreciates and will consider MCI's input, including MCI's proposal entitled "BellSouth/MCI Change Management Process for OSS Interfaces" that you provided recently. BellSouth's goal is present the plans to you by mid December.

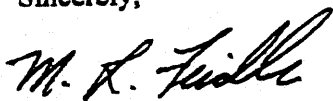
As information, our plans will address BellSouth's support of dual OSS platforms. At this time, BellSouth will support dual platforms associated with EDI releases for 60 days. When technically feasible, the CLECs will have the opportunity to negotiate longer periods for the dual platforms, however, due to the potentially significant expenses associated with supporting multiple platforms, there will likely be additional charges to the CLECs should BellSouth agree to extending the dual platforms beyond 60 days. We will address dual platforms for LENS and other systems as part of our change notification plan that should be finalized in early December.



- Loss Notification/NDM: Currently MCI is receiving information regarding disconnections via paper. Pursuant to Attachment VIII, section 2.2.12, MCI has agreed, in a September 10, 1997 letter to Cliff Bowers of BellSouth, to an interim method of notification via Network Data Mover. BellSouth can provide such data via Network Data Mover in June 1998. We understand your desire that we implement this arrangement by the end of the year. This possibility is being reviewed by appropriate BellSouth management. The account team will notify the appropriate MCI representatives by Friday, November 21, 1997, as to whether this delivery date can be moved up.
- RSAG: Within the next two weeks, BellSouth will be able to provide you cost estimates and the time and price for developing the detailed design, project plan, and a firm quote for the overall delivery. Please note that BellSouth is exploring the development of an Application Programming Interface (API) that may better suit your needs. It is my understanding that five MCI employees will be at a BellSouth meeting on November 14, 1997 to discuss this interface. At present, BellSouth is meeting its contractual obligations regarding MCI's access to SAG data.
- Common Graphical Interface (CGI): CGI specifications were sent to you by the account team on November 7, 1997. These specifications will allow MCI to build its Common Graphical Interface. The next release of specifications is in development. This will be a supplement to the existing specifications and will allow MCI to add some fields that are not represented in the current specifications. MCI does not have to wait for the next release to begin building its Common Graphical Interface since the next release will simply be an extension of the existing specifications. Once MCI has reviewed the specifications, BellSouth can establish a Joint Implementation Team (JIT) with MCI to begin developing plans, including timelines, to implement CGI.

We will keep you apprised as to our progress on each of these important issues. Meanwhile, if you have any questions or need additional information, please call me at 404-927-7530.

Sincerely,



Mark Feidler



BellSouth Interconnection Services  
Suite 420  
1960 West Exchange Place  
Tucker, Georgia 30084

770 492-7510  
Fax 770 621-0632  
MCI ID 361-2848

Pam Lee  
Sales Assistant Vice President  
MCI Account Team

November 12, 1997

Mr. Marcel Henry  
Regional Vice President  
Southern Financial Operations  
MCI Telecommunications  
Three Ravinia Drive  
Atlanta, Ga. 30346

Dear Marcel,

Recently, you brought your concerns over MCI's perceived lack of progress on several critical MCI OSS issues, including Change Management, Loss Notification/NDM, RSAG, and LENS Screen Scrapping (CGI), to the attention of Mark Feidler.

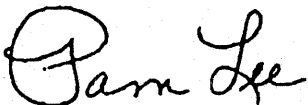
A number of issues are outside of the BellSouth contractual obligations to MCI. However, as your customer advocate at BellSouth, I want to assure you that BellSouth has been very focused in our quest to find ways to meet MCI's requests in this area. These outstanding issues are complex and BellSouth must make sure that the responses are fully researched and as correct and current as possible. To ensure you understand exactly where we are on these issues, I have summarized below their current status and our plans for addressing each one.

- **Change Management:** We are in the process of developing a systems notification plan that we hope will provide all CLECs ample advance notification of all changes that affect CLEC systems or operations. We appreciate and will consider MCI's input, including the "BellSouth/MCI Change Management Process for OSS Interfaces" that MCI provided recently. Our goal is to finalize our plans for this notification process by early December, 1997. Prior to finalizing these plans we would like to present them to MCI and obtain your feedback. As information, our plans will address the supporting of dual platforms. At this time, BellSouth will support dual platforms associated with EDI releases for 60 days. When technically feasible, the CLECs will have the opportunity to negotiate longer periods for the dual platforms. Due to the enormous expenses associated with supporting multiple platforms, there will likely be additional charges to the CLECs should BST agree to extending the dual platforms beyond 60 days. We will address dual platforms for other systems, including LENS, as part of our change notification plan that should be finalized in early December.

- **Loss Notification/NDM:** Currently MCI is receiving information regarding disconnections via U.S. mail. In Bryan Green of MCI's September 10, 1997, letter to Cliff Bowers of BellSouth, MCI has requested that pursuant to Attachment VIII, section 2.2.12 of the MCI/BellSouth Interconnection Agreements, that BST send, as an interim arrangement, this information via Network Data Mover (NDM). BellSouth can provide this data via NDM in June, 1998. MCI's request that we implement this arrangement along with key enhancements (partial losses and positive notification daily) by the end of the year is being reviewed by the appropriate management teams. We will notify you by Tuesday, November 18, 1997, as to whether the delivery date can be moved up.
- **RSAG:** Within two weeks, we will be able to provide you cost estimates and the time and price for developing the detailed design, project plan, and a firm quote for the overall delivery of the RSAG data necessary to perform address validations. Please note that we are exploring the development of an Application Programming Interface (API) that may better suit your needs. Five MCI employees will be at a BellSouth meeting on November 14, 1997, to discuss this interface. At present, BellSouth is meeting its contractual obligations regarding MCI's access to SAG data.
- **LENS Screen Scrapping (CGI):** CGI specifications were sent to Bryan Green by the account team on November 7, 1997. These specifications will allow MCI to build its screen scrapping capability. The next release of specifications will be available in approximately four weeks. They will be a supplement to the existing specifications and will allow MCI to add some fields that are not represented in the current specifications. MCI does not have to wait for the next release to begin building its screen scrapping capability since the next release will simply be an extension of the existing specifications. Once MCI has reviewed the specifications, we can establish a Joint Implementation Team (JIT) with you to begin developing plans, including timelines, to implement CGI.

We will keep you apprised as to our progress on each of these important issues. Meanwhile, if you have any questions or need additional information, please call me at 770-492-7510.

Sincerely,



cc: Bryan Green



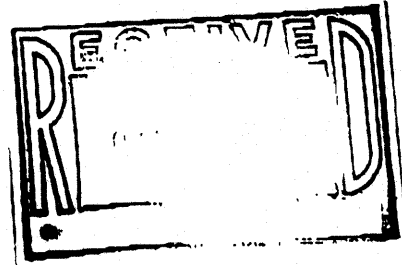
BellSouth Interconnection Services  
Suite 420  
1960 West Exchange Place  
Tucker, Georgia 30084

770 492-7510  
Fax 770 621-0632  
MCI ID 361-2846

Pam Lee  
Sales Assistant Vice President  
MCI Account Team

October 10, 1997

Mr. Marcel Henry  
Regional Vice President  
Southern Financial Operations  
MCI Telecommunications, Inc.  
Three Ravinia Drive  
Atlanta, Georgia 30346



Dear Marcel:

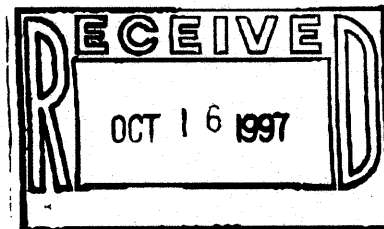
This is in response to your September 18, 1997, letter to Joe Baker regarding the three issues you asked him to review and to assist in a resolution for each issue. We value our relationship with MCI and are continuously striving to meet your needs whenever and wherever we can. However, we are not always able to meet MCI's requests in the specific manner requested. Unfortunately, with the exception of our plans for handling rejects through EDI, this is the case with the issues you have brought to our attention. The following is a summary of BellSouth's position on each of the three issues:

1) CARE Processing:

Our position is still the same as that described in the September 19, 1997, email from Kim Uhles of BellSouth to Phyllis Maslia of MCI and the July, 1997, letter from Susan Arrington of BellSouth to Helen Arthur of MCI. BellSouth has not yet established a process for advising CLECs when their customers change their PIC. However, BellSouth will work with MCI to document your requirements and develop a time and price estimate to deliver this enhancement if you desire.

2) Regional Street Address Guide (RSAG):

BellSouth is open to working with MCI to understand the information that MCI needs out of RSAG and to develop the time and costs required to develop this enhancement.



3) EDI Transactions:

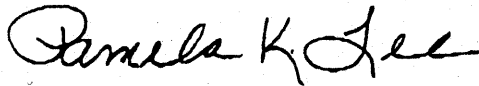
\* Jeopardies: As explained verbally to MCI on several occasions, BellSouth's position is generally to adhere to national standards for EDI. To date, national standards have not been established for jeopardies.

\* Rejects: This will be addressed in Release 2.0 as part of our upgrade to TCIF Issue 7, which is tentatively scheduled for January 30, 1998.

\* Loss Notification: As described in Cliff Bowers', BellSouth, August 8, 1997, letter to Helen Arthur, MCI, BellSouth does not have the capability at this time to offer the EDI 836 transaction set for loss notification nor does BellSouth have plans to develop that capability. However, BellSouth will work with MCI to document your requirements and to develop a time and price estimate to deliver this enhancement if you desire.

Although we are unable to commit to addressing all of the issues in the manner MCI originally requested, BellSouth's Account Team and Product Team representatives met on September 30, 1997, with Bryan Green, MCI, and members of his staff to discuss these issues as well as other topics. In the meeting both companies agreed to investigate and seek other mutually satisfactory means of addressing each issue. I will keep you informed as to our progress, and in the meantime, please let me know if you have any questions or need additional information.

Sincerely,





**MCI Telecomm. Corporation**

Three Ravinia Drive  
Atlanta, GA 30346  
770 280 7840  
Fax 770 280 7849  
Internet: 2161607@MCIMail.Com

**Marcel Henry**  
Regional Vice President  
Southern Financial Operations

September 18, 1997

Mr. Joe Baker, Vice President – Sales  
Interconnection Services  
**BellSouth Telecommunications, Inc.**  
Suite 4423  
675 West Peachtree Street  
Atlanta, Georgia 30375

Dear Joe:

This is a follow-up to our breakfast meeting on August 29th. These are issues that have been brought to my attention that have yet to be resolved. As a result, I am asking for BellSouth executive involvement (yours specifically) to get these issues resolved.

- 1) CARE Processing
- 2) Regional Street Address Guide
- 3) EDI Transactions (Jeopardies/Rejects/Loss Notification)

In the case of the first two items, BellSouth states that it is not obligated to provide the service. However, while not addressing this claim, I would note that the absence of these items affects our ability to either process orders or keep accurate records. In either case lack of a workable solution will create more work for both companies in the form of longer order processing intervals and/or manual processing.

Regarding the last item: I do not understand why BellSouth would provide notification of jeopardies, rejects, or losses via fax. It is an inefficient way to do business, especially when electronic communications exist between our two companies.

In my opinion, the resolution of these issues should be based on what makes good business sense, rather than taking the stance that it doesn't get done unless BellSouth is ordered to do so. This is particularly true in cases, such as these three, where BellSouth has the ability to provide what MCI is requesting, and where MCI's requests advance the goal of true competition in the local exchange market. I trust that in your review you will agree and your involvement will bring these issues to closure.

Please call me if you have any questions about these issues. I have additional details if needed.

Regards,

**Marcel Henry**

MH/mle  
Sfo0797ltr



BellSouth Interconnection Services 770 492-7500  
Suite 420 Fax 770 621-0632  
1960 West Exchange Place  
Tucker, Georgia 30084

MCI Account Team

August 20, 1997

Mr. Walter J. Schmidt  
MCI Telecommunications Corporation  
780 Johnson Ferry Road  
Atlanta, Georgia 30342

Dear Wally,

This is in response to Bryan Green's verbal request to provide MCI with a copy of BellSouth's Regional Street Address Guide (RSAG) database files and RSAG record layouts and to your letter dated August 18, 1997, regarding the same subject. In accordance with the MCI/BST Interconnection Agreement, MCI can access BellSouth's RSAG database through the Local Exchange Navigation System (LENS) and/or via Interexchange Carrier Reference Validation (ICREF) service.

The RSAG database files are extremely voluminous for downloading and the fact is that the database changes so rapidly it would be outdated by the time MCI would be in receipt of the database files. The RSAG technical specifications are proprietary.

MCI may pursue receipt of the RSAG database files in a form other than that described in the Interconnection Agreement through the Agreement's Bona Fide Request (BFR) process. I trust that the above provides you with the desired information.

Sincerely,

A handwritten signature in cursive script that reads "Cliff Bowers".

*for* Pam Lee  
Sales Assistant Vice President

cc: Joe Baker - BST  
Marcel Henry- MCI  
Charlene Keys - MCI  
Bryan Green - MCI  
Jeremy Marcus - MCI



**MCI Telecommunicat.  
Corporation**

780 Johnson Ferry Road  
Atlanta, GA 30342  
404 267 5500

August 18, 1997

Ms. Ilene Barnett  
Sales Director  
BellSouth Interconnection Services  
1960 West Exchange Place  
Tucker, GA 30084

Dear Ms. Barnett:

This letter is in response to Cathy Forbes' June 26 letter, which replied to Helen Arthur's June 16, 1997 inquiry in reference to the following section in the MCImetro-BellSouth Interconnection Agreement:

**Attachment VIII**

**2.1.3 Street Address Guide (SAG)**

2.1.3.1 Within thirty (30) days after the Effective Date of this Agreement, BellSouth shall provide to MCI in the SAG data, or its equivalent, in electronic form. All changes to the SAG shall be made available to MCI on the same day as the change to the data is made.

This section clearly requires BellSouth to provide to MCI in electronic form either the SAG data or its equivalent. As it is more than thirty (30) days since the interconnection agreements became effective in Georgia, Florida, Tennessee, and North Carolina, BellSouth is overdue in providing to MCI in electronic form the SAG data.

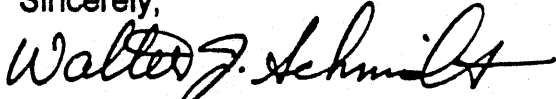
Ms. Forbes letter states, and I quote, " Since, BellSouth is unable to provide the initial SAG data and daily updates in batch form the only available equivalent would be using online access". MCI is capable of accepting an electronic download of this data via NDM until a regular mechanized daily batch process can be implemented to accommodate daily updates.

MCI insists that BellSouth comply with the terms of its interconnection agreements with MCI and provide MCI in electronic form with the SAG data no later than August 29, 1997. Failure to do so will significantly hamper MCI's entry into the local market by forcing MCI to continue to contend with manual intervention in the pre-ordering/ordering process to verify customer street address information, and, will demonstrate BellSouth's continued lack of compliance with the contracts.



Please reply to this letter no later than August 22, 1997.

Sincerely,

A handwritten signature in cursive script, appearing to read "Walter J. Schmidt".

Walter J. Schmidt

cc: Marcel Henry - MCI  
Charlene Keys - MCI  
Bryan Green - MCI  
Jeremy Marcus - MCI  
Joe Baker - BellSouth  
Pam Lee - BellSouth



BellSouth Telecommunications, Inc.  
Room 34S91 BellSouth Center  
675 West Peachtree Street, N.E.  
Atlanta, Georgia 30375

June 26, 1997

Ms. Helen Arthur  
MCI Telecommunications Corporation  
Suite 500  
780 Johnson Ferry Road  
Atlanta, Georgia 30342

RE: MCI/BellSouth-GA Interconnection Agreement - Attach VIII, Sect 2.1.3

Dear Ms. Arthur:

This letter is in response to your inquiry of June 16, 1997 in reference to the following stipulation in the MCI/BellSouth Interconnection Agreement:

Attachment VIII  
2.1.3 .1 Street Address Guide (SAG)

Within thirty (30) days after the Effective Date of this Agreement, BellSouth shall provide to MCI the SAG data, or its equivalent, in electronic form. All changes to the SAG shall be made available to MCI on the same day as the change to the data is made.

Your interpretation of the above stipulation is that BellSouth will provide the Street Address Data, not online access, to MCI. However, the stipulation states that BellSouth is to provide the SAG data to MCI or its equivalent in electronic form. Since, BellSouth is unable to provide the initial SAG data and daily updates in batch form the only available equivalent would be using online access.

Sincerely,

A handwritten signature in cursive script that reads "Cathy Forbes".

Cathy Forbes  
Compliance Manager  
Interconnection Services

cc: Ilene Barnett



MCI Telecommunications  
Corporation

780 Johnson Ferry Road  
Suite 500  
Atlanta, GA 30342

June 16, 1997

Ilene M. Barnett  
Sales Director  
MCI Account Team  
BellSouth Interconnection Services  
Suite 420  
1960 West Exchange Place  
Tucker, Georgia

Dear Ilene,

Thanks for the prompt response regarding the Regional Street Address Guide. For your reference, I have included in this letter an excerpt from the MCImetro - BellSouth Georgia Interconnection Agreement, Attachment VIII, Section 2.1.3:

**"2.1.3 Street Address Guide (SAG)**

2.1.3.1 Within thirty (30) days after the Effective Date of this Agreement, BellSouth shall provide to MCI the SAG data, or its equivalent, in electronic form. All changes to the SAG shall be made available to MCI on the same day as the change to the data is made".

It is my understanding that the SAG data is to be provided to MCI, not simply the access to the data. As per the Interconnection Agreement, MCI is requesting the Regional SAG data be provided for the states of Georgia, Tennessee and North Carolina. Please respond in writing by June 25, 1997.

If you have any questions, please contact me on 404-267-6580. Thanks again for your assistance in this matter.

Cc: Bryan Green  
Georjean Simmons

## **Beverly Gordon**

**From:** Arthur, Helen (MCI) [Helen.Arthur@mci.com]  
**Sent:** Wednesday, September 17, 1997 1:28 PM  
**To:** 'Beverly Gordon'  
**Subject:** FW: Technical Specifications



Excerpts for SAG  
data.doc



Technical

Helen Arthur  
V825-6580  
404-267-6580  
1-888-866-2376 pager

-----Original Message-----

**From:** Bryan Green [SMTP:Bryan.Green@MCI.Com]  
**Sent:** Saturday, June 14, 1997 2:59 PM  
**To:** Kathy Pounds [Kathy.Pounds@MCI.Com] (E-mail);  
Marsha Ward (E-mail); Martha McMillin (E-mail); Ron Martinez (E-mail)  
**Cc:** Helen Arthur [Helen.Arthur@MCI.Com] (E-mail);  
Charlene Keys (E-mail); Daren Moore (E-mail); Debra A. Henson (E-mail);  
Marcel Henry [E-mail] (E-mail); 'Thomas O Seitz' (E-mail); Wally Schmidt  
(E-mail)  
**Subject:** FW: Technical Specifications

-----Original Message-----

**From:** Ilene.M.Barnett  
[SMTP:Ilene.M.Barnett@bridge.bellsouth.com]  
**Sent:** Friday, June 13, 1997 2:03 PM  
**To:** Bryan Green  
**Cc:** Helen Arthur; Lee Pamela\_K/AL\_BRHM07  
**Subject:** Technical Specifications

Bryan,

On May 30, 1997, I provided to you the Atlas Design Document. Based on your 6/5/97 e-mail, either you are not in receipt of the document or the material was not sufficient for your purposes. If you did not receive it along with the LENS Applications User Guide, let me know and I will send another copy. The document that was sent, is the only specifications available.

I have requested the ICREF technical specifications; to date I have not received the document. I followed up on my request today and it is being worked. I will immediately notify you when I receive this and have it delivered to you.

ATLAS was not a temporary solution that would be replaced with LENS. The NDM connection to ATLAS was the temporary

solution which was replaced with LENS connection. ATLAS remains the same, the connection vehicle change.

You also requested a download of the RSAG database. In today's environment, MCI has two methods to access the data in that database - ICREF and LENS. I currently send your organization a weekly report of the hits by MCI on ICREF. Scott Brown was the recipient of this information. In discussing this request with Linda Tate (BST), Linda said that BellSouth at this time is not in a position to provide a download of this database due to the following:

- 1) The database size is massive and not manageable with the daily activity and
- 2) MCI and other CLECs currently have access to the data through LENS and ICREF.

If you would like to discuss this further, please call me on (770)492-7525.



**BellSouth Interconnection Services**

Suite 420

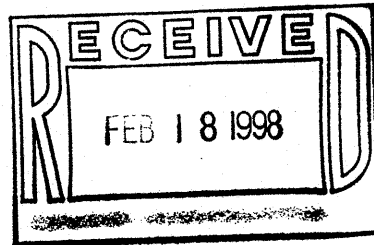
1960 West Exchange Place

Tucker, Georgia 30084

770 492-7500

Fax 770 621-0632

**MCI Account Team**



February 10, 1998

Mr. Bryan Green  
MCI Telecommunications  
2520 Northwinds Parkway  
Alpharetta, GA 30004

Dear Bryan,

This letter is responding to MCI's verbal request for an explanation in writing regarding the removal of Unbundled Digital Loop and Unbundled Digital Interoffice Transport from the LEO Guide, Volume 3, Issue 2.

The LEO Guide represents services which the CLECs may order electronically. As more fully explained in my letter of February 10, 1998 to Helen Arthur, Unbundled Digital Loops and Unbundled Digital Interoffice Transport can only be ordered manually. Therefore, to avoid confusion, BellSouth corrected the LEO Guide to accurately reflect the elements that can be ordered electronically.

If you need additional information, please feel free to call me.

Sincerely,

A handwritten signature in cursive script that reads "Cliff Bowers".

Cliff Bowers

## **SFO-DOC**

---

**From:** Alan Anglyn [Alan.Anglyn@MCI.com]  
**Sent:** Friday, January 30, 1998 10:04 AM  
**To:** Michael Willis (E-mail); Beverly Gordon (E-mail)  
**Subject:** FW: Action Item from Last Week's meeting

F/R EDI

-----Original Message-----

**From:** Alan Anglyn [SMTP:Alan.Anglyn@MCI.com]  
**Sent:** Friday, January 30, 1998 10:02 AM  
**To:** 'Judy.Rueblinger1@bridge.bellsouth.com'  
**Cc:** Clifford.H.Bowers@bridge.bellsouth.com; Bryan.Green@MCI.com  
**Subject:** RE: Action Item from Last Week's meeting

It's the Resale Section of Volume 1. Refer to our meeting minutes for the particular data elements. In the LEO Guide, these data elements indicate they are only applicable to REQ TYP of E, but BellSouth stated in our meeting they are required on REQ TYP of A and B.

Alan

-----Original Message-----

**From:** Judy.Rueblinger1@bridge.bellsouth.com  
[SMTP:Judy.Rueblinger1@bridge.bellsouth.com]  
**Sent:** Friday, January 30, 1998 9:35 AM  
**To:** Alan.Anglyn@MCI.com  
**Cc:** Clifford.H.Bowers@bridge.bellsouth.com; Bryan.Green@MCI.com;  
Judy.Rueblinger1@bridge.bellsouth.com  
**Subject:** Action Item from Last Week's meeting

Alan,

Do you recall or can you find out from Dot the specific location in the LEO Guide? The LEO guide, GENERAL tab, page 4, has noted that the Resale form is applicable. Do you think perhaps that it was the "Local Interconnection and Facility Based Ordering Forms Matrix" in the Ordering Guide that is incorrect?

I do agree that if there's a discrepancy with either it should be on our action item list.

Thanks,

Judy

## SFO-DOC

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**From:** Alan Anglyn [Alan.Anglyn@MCI.com]  
**Sent:** Friday, January 30, 1998 10:06 AM  
**To:** Michael Willis (E-mail); Beverly Gordon (E-mail)  
**Subject:** FW: Action Item from Last Week's meeting

F/R EDI

-----Original Message-----

**From:** Alan Anglyn [SMTP:Alan.Anglyn@MCI.com]  
**Sent:** Thursday, January 29, 1998 4:56 PM  
**To:** Judy Rueblinger (E-mail); Cliff Bowers (E-mail)  
**Cc:** 'Bryan Green'  
**Subject:** Action Item from Last Week's meeting

Judy & Cliff,

Dot Williams, who attended the meeting last week, reviewed her notes and pointed out an action item that we missed in our minutes. Recall that the Resale form is required on unbundled loop orders. In the meeting, we discussed that the documentation needs to be corrected to reflect this. BellSouth's action item was to make this change in the LEO Guide.

Please respond. If you agree this is accurate, I'll update the Action Items list.

Thanks,  
Alan  
(770) 625-6803



## **SFO-DOC**

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**From:** Alan Anglyn [Alan.Anglyn@MCI.com]  
**Sent:** Thursday, January 29, 1998 3:40 PM  
**To:** Beverly Gordon (E-mail); Michael Willis (E-mail)  
**Subject:** FW: LEO Guide

F/R EDI

-----Original Message-----

From: Judy.Rueblinger1@bridge.bellsouth.com  
[SMTP:Judy.Rueblinger1@bridge.bellsouth.com]  
Sent: Thursday, January 15, 1998 9:53 AM  
To: alan.anglyn@mci.com; helen.arthur@mci.com; bryan.green@mci.com  
Cc: Clifford.H.Bowers@bridge.bellsouth.com;  
Sheryl.B.Chapman@bridge.bellsouth.com; Tom.Moquin@bridge.bellsouth.com  
Subject: LEO Guide

Sheryl Chapman just called with answers to some of the issues brought up in today's meeting.

First of all in regards to the LEO Guide and the March dates on the web, these are correct. It was never the intent to have the web updated with the new guides on January 15. TCIF 7 will be reflected in the March update. Linda is sending Bryan a "bootleg" copy of the LEO Guide (all volumes) that include TCIF 7 information.

In regards to maintaining two versions of the documents that pertain to OSS maintenance on the web, this can be and will be done. BellSouth will maintain the old and current versions of the LEO Guide, Volume 1, LENS User Guide and TAFI Guide on the web. (Since volumes 2 and 3 of the LEO Guide do not deal with system changes, we didn't see a need to keep two versions of those on the web. Do you agree?)

Lastly, going forward, when a new version of documents go on the web, they will contain a change version or summary that lists what the changes for that version are. The paper copy of the LEO Guide, Volume 2 that we gave Helen today should have one. We are trying to get our hands on that now. One thing Sheryl is still checking on is why two sections, Unbundled Loops and Dedicated Transport, were removed from Volume 3.

If there's something I haven't covered, let me know.

Thanks,

Judy

## SFO-DOC

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**From:** Beverly Gordon [Beverly.Gordon@mci.com]  
**Sent:** Wednesday, January 07, 1998 4:46 PM  
**To:** 'SFO-DOC - Michael Willis'  
**Subject:** FW: BellSouth PDF Format for CLEC Guides

-----Original Message-----

**From:** Alan Anglyn [SMTP:Alan.Anglyn@MCI.com] <mailto:[SMTP:Alan.Anglyn@MCI.com]>  
**Sent:** Wednesday, January 07, 1998 2:56 PM  
**To:** Cliff Bowers (E-mail); Judy Rueblinger (E-mail)  
**Cc:** Bryan Green (E-mail); Beverly Gordon (E-mail); Anna Hopkins (E-mail); Helen Arthur (E-mail)  
**Subject:** BellSouth PDF Format for CLEC Guides

Cliff & Judy,

While I was eating lunch, I thought I would check out BellSouth's web site and confirm the PDF file capability. I quickly arrived at the page that had the PDF files. I found the instructions easy to follow. I noticed there were a couple of guides for which PDF was not available. These were Volume 2 of the LEO Guides and the CLEC TAFI End User Guide. The TAFI guide is not a concern, but MCI definitely uses Volume 2 of the LEO Guides.

I decided to pick the smallest of the LEO Guides, Volume 3, and download it. Here again, this procedure worked well. When I opened the document in Adobe Acrobat Reader, I was not surprised to see some format differences since PDF is different from HTML. What I was very surprised to see, though, was that the contents of LEO Volume 3 are not the same! A quick check of the Table of Contents of the PDF version to the HTML revealed that Unbundled Digital Loops and Unbundled Interoffice Transport are not in the PDF version. One or the other is obviously incorrect, and I think it is the PDF version.

At this point, I stopped reviewing the PDF version. I do not plan to use it nor even let folks within MCI know about it until such time that BellSouth has the opportunity to evaluate this problem and correct it. Additionally, I suggest that BellSouth not limit its evaluation to LEO Volume 3. Part of the process of converting these documents to PDF should be verification of the completeness of the conversion. This should be performed for all of the documents.

Please advise me as to when BellSouth is able to confirm the completeness of the PDF capability. Once we can depend on it, it will be useful to us. Also, please advise when LEO Volume 2 will be available.

Alan



BellSouth Interconnection Services  
Suite 420  
1960 West Exchange Place  
Tucker, Georgia 30084

770 492-7500  
Fax 770 621-0632

MCI Account Team

November 24, 1997

Mr. Bryan Green  
MCI Telecommunications Corporation  
780 Johnson Ferry Road  
Suite 500  
Atlanta, Georgia 30342

Dear Bryan,

This is in response to your verbal request on November 6, 1997, and letter dated November 12, 1997, for BellSouth to state, in writing, its position regarding the Additional Listing/REFNUM issue that was discovered during the EDI testing process. In an e-mail dated October 15, 1997, Gloria Burr of BellSouth advised Helen Arthur of MCI that BellSouth agrees that additional listings populated under the same ref num is an issue to be worked by BellSouth's EDI support team. In order to facilitate testing, BellSouth will not reject any MCI requests with additional listings associated with this condition. Other errors that are not related to this issue will be rejected or returned for clarification. This has been reiterated verbally on numerous occasions.

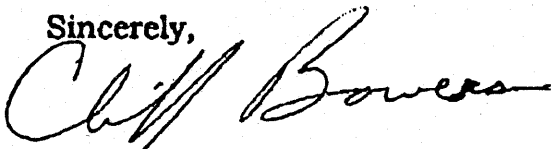
BellSouth has also advised MCI during several conference calls that BellSouth will continue to accept orders of this type of additional listings in a production mode if this issue is not corrected prior to the production date. BellSouth understands that MCI's expectation is that BellSouth will not reject any errors (production or test) if MCI's programming work is not complete.

During the EDI testing conference call on November 5, 1997, Linda Tate of BellSouth explained to the MCI participants that BellSouth had inadvertently provided incorrect information in the LEO Implementation Guide for this arrangement, however, BellSouth's coding for this was actually correct and in compliance with the OBF standards. During the call, Ms. Tate explained that in order for BellSouth to meet the OBF standards and to be able to provide the interim EDI reject process, MCI will be required to change its mapping. BellSouth is willing to consider providing MCI support to assist

in ensuring that this situation does not delay the ongoing EDI testing. This offer will also apply to assisting MCI to take advantage of the interim reject process.

As always, BellSouth is willing to work with MCI, as necessary, to help MCI attain our mutual goals of moving into production for both EDI version 6.2 and the interim reject process. Please let me know if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Cliff Bowers". The signature is written in dark ink and is positioned above the printed name.

Cliff Bowers



MCI Telecommur ions  
Corporation

780 Johnson Ferry Road  
Suite 500  
Atlanta, GA 30342

November 12, 1997

Clifford Bowers  
Sales Director  
BellSouth Interconnection Services  
Suite 420  
1960 West Exchange Place  
Tucker, Georgia 30084

Dear Cliff:

On October 13, 1997, MCI sent transactions to BellSouth for the purpose of testing the ordering interface via EDI as part of End-to-End testing. These test cases were inappropriately rejected because they contained additional listing information. After these erroneous rejections were brought to BST's attention, BST acknowledged the problem and asked that we hold all orders with additional listings. On November 5, 1997 BellSouth informed MCI that BellSouth's Local Exchange Ordering (LEO) guide contains incorrect formatting specifications and that their research had confirmed that there was no way to fix this problem without impacting MCI's coding. BST requested that MCI change its coding to comply with changes for additional listings. BellSouth also stated that orders containing additional listings would not be rejected during testing and if need be would not be rejected during production.

In order to correctly modify our mapping, on November 5, MCI requested examples of the corrected format. MCI also requested written confirmation of the problem as well as written assurance that this problem would not impact our testing or production environments while corrections are being made. As of today, 11/12/1997, MCI has not received the specifications requested or BellSouth's commitment in writing.

MCI cannot move forward with any changes to its coding until both the specifications and the written confirmation are received. In addition, MCI is approaching a code freeze effective 11/17/97, after which no changes will be possible outside of a change management process. The completion of the End-to-End testing schedule is in jeopardy each day that BellSouth fails to resolve this issue. Please provide the requested information no later than November 13, 1997.

Sincerely,

Helen Arthur

cc: Bryan Green  
Pamela Lee  
Joe Baker  
Marcel Henry

## **Arthur, Helen (MCI)**

**From:** Arthur, Helen (MCI)  
**Sent:** Thursday, November 06, 1997 12:20 PM  
**To:** Becky Spillman; Beverly Gordon; Bryan Green; Carol Desborough; Cherie Willard; 'Diane Palma'; Eric Dove; GEORGE PIERCE; Helen Arthur; Janice Scudieri; John Hinds; kate cooper; Kate Jones; Lee Anderson; Lisa Benvenuto; Lisa West; Michael Callahan; paula mizell; Randy W. Bailey; Regina Livelsberger; Renee Rolling; Victor Hugo  
**Subject:** MCI-BST EDI Testing Call - 11/5/97

The daily MCI-BellSouth EDI Testing call was held on Wednesday 11/5/1997 at 3:30 PM EST, 2:30 PM CST.

**Attendees:**

Jerry Yarbrough - BST	Diane Palma - MCI
Cliff Bowers - BST	John Hinds - MCI
Regina Livelsberger - MCI	Vic Peterson - MCI
Judy Rueblinger - BST	Renee Rolling - MCI
Cherie Willard - MCI	Gloria Burr - BST
Cassandra Daniels - BST	Marcia Moss - BST
Linda Tate - BST	Kate Jones - MCI
John Hawkins - BST	Carol Desborough - MCI
Helen Arthur - MCI	

1. Additional Listings - Linda Tate stated that BellSouth has discovered an error in the Implementation Guide. An assessment of BellSouth's coding has determined that there is no way to fix the problem without impacting MCI's coding. To include this development in EDI Version 7 would delay the fix beyond MCI's implementation date. The BellSouth documentation for additional listing does not comply with OBF standards, which require a REF NUM and TN for each entry. BellSouth is requesting that MCI make a change to its map. Examples of the correct format for additional listings will be provided on 11/6/97. The MCI development team will need to review the documentation and determine the level of effort required to change the mapping. In the interim, BellSouth stated that it will continue to process orders containing additional listings populated under the same REF NUM.
2. Additional Listings with RingMaster - On 11/6/97 BellSouth will provide examples of the correct format for ordering RingMaster with additional listings. MCI needs to change its coding to send the USOC 'AL' rather than 'AML'.
3. Quantity of 860 transactions - Linda Tate stated that BellSouth will process as many transactions as MCI sends. MCI's expectation is that the 24-Hour turnaround commitment will continue to be met, in testing and production environments.
4. Daily calls should not last more than one hour. In order to maximize the time allotted for the daily call, participants are encouraged to call in on time. MCI will send orders daily at 10:30 AM EST. This will allow BellSouth time to process the orders and have results ready for the afternoon call. BST will be notified if this time will not be met. The Issues Matrix and the transaction spreadsheet will be distributed by noon EST daily. This will allow all participants time to receive, print and review the data prior to the meeting.
5. Results of orders sent on 11/3/97:
  - PON # 2292 (860) - MCI needs to resend an 860 transaction with the PIC freeze code and caller id usoc.
  - PON # 2293 (850) - BST's application is missing the CFN which was included on the order. Gloria Burr will investigate. MCI resent this order on 11/5.
  - PON # 2295 - MCI will resend this case with the caller id usoc.
  - PON # 2296 - This case was resent on 11/5 without the DPD, DAH codes.
  - PON # 2297 - MCI will resend with required feature detail code for CREX4.
  - PON # 2298 - This telephone number is actually a business telephone number. MCI will send 860 to cancel this PON # and issue a new PON as a Business order.
  - PON # 2299 - MCI will resend with required feature detail code for CREX4, and caller ID USOC.
  - PON # 2300 - This case was resent on 11/5 as PON # 3350 (860).
  - PON # 2301 - MCI will resend as an 860 with correct qualifier 'SF'.

6. MCI sent 4 orders today. Positive 997s were received. BellSouth's EDI system completed processing the 4 PONs at 2:25 PM CST and loaded to LEO at 2:40 PM CST.
7. The daily call will resume on Thursday 11/6/97 at 3:30 PM EST, 2:30 PM CST. The bridge is v222-9362, 1-800-593-8905, pass code = 6562.



EDI Testing Issues -  
6-95.doc

Thanks,  
Helen Arthur  
Southern Financial Operations  
V825-6580  
404-267-6580  
1-888-866-2376 pager

**Alan Anglyn**

**From:** Judy.Rueblinger1@bridge.bellsouth.com  
**Sent:** Thursday, October 16, 1997 7:12 AM  
**To:** alan.anglyn@mci.com  
**Cc:** Clifford.H.Bowers@bridge.bellsouth.com  
**Subject:** BellSouth Ordering Guides

Alan,

In response to your 9/25/97 memo on this subject I owed you responses on three of your concerns. I have typed up each concern and our response below:

1. Date to expect Multiserv, LightGate and Megalink on our web site.

Since our original referral to our documentation group we have subsequently sent your list of discrepancies. We have asked that BellSouth perform the same type "scrub" as you did. We have asked the Director, Tom Moquin, of that group to address this in our 10/20/97 OSS meeting.

2. Acknowledgment from Documentation Group that ISSUE DATE is to be the Month/Year document is distributed.

We have received confirmation that going forward the ISSUE DATE on the LEO Guide will be the date it is distributed. We are pursuing the same for all CLEC documentation on our web site.

3. Document to order Port/Loop Combo on web.

The document for ordering port/loop combos will not be placed on the web site because a "port/loop combination" is not a BellSouth offering. At this time we are accepting the two elements on a single request (in all states except Kentucky) for ease of ordering but billing them as resale. In Kentucky, we can process these as UNES using the Product Development Request process.

Please let me know if you have any questions.

Thanks,

Judy



## **SFO-DOC**

---

**From:** Michael Willis [michael.willis@mci.com]  
**Sent:** Friday, November 07, 1997 11:20 PM  
**To:** 'SFO-DOC'  
**Subject:** FW: BellSouth Ordering Guides

-----Original Message-----

**From:** Alan Anglyn [SMTP:Alan.Anglyn@MCI.com]  
**Sent:** Thursday, October 09, 1997 4:37 PM  
**To:** Anna Hopkins (E-mail); Beverly Gordon (E-mail); Helen Arthur (E-mail); Michael Willis (E-mail)  
**Subject:** FW: BellSouth Ordering Guides

FYI

-----Original Message-----

**From:** Judy.Rueblinger1@bridge.bellsouth.com  
[SMTP:Judy.Rueblinger1@bridge.bellsouth.com]  
**Sent:** Monday, October 06, 1997 2:59 PM  
**To:** Alan.Anglyn@MCI.Com  
**Cc:** Clifford.H.Bowers@bridge.bellsouth.com;  
Sharon.R.Daniels@bridge.bellsouth.com  
**Subject:** BellSouth Ordering Guides

Alan,

Listed below are the responses I have so far to your questions. As I mentioned last Wednesday I am still working on a couple of them.

1. There are products that were in the Resale Ordering Guide (ROG) that are not in the Information Package for Resale Interconnection Services. Given that the on-line guides replace the ROG, there appears to be a gap in what is covered in the on-line guides. Some examples are Multiserv, LightGate, and Megalink. What is the reason for this omission.

A: We believe these documents were inadvertently omitted. We have done two things as a result of your referral. One, we have asked that the specific documents you referenced be placed on the web. Secondly, are taking measures to "scrub" existing documents with the web site.

2. Now that a BellSouth EDI format is available for ISDN BRI and Synchronet, can these products be ordered without first going through the account team? The Information Package for Resale Interconnection Services states ISDN BRI forms should be submitted to the account team. Synchronet is not in the Information Package for Resale Interconnection Services; however, in the ROG it was listed as a product ordered via the account team.

A: Even though these requests can be submitted through the process as it exists today requires the CLEC to manually submit the request to the account team because of additional internal paperwork that must be done.

However, staff is re-addressing this process and hopes to have a new process in place by the end of the month. We are hopeful that by the time you cut to EDI, your ISDN BRI and Synchronet requests can be submitted through EDI.

3. Why were sections of the LEO guide issued in September with an Issue Date of July? Shouldn't these show the date of the actual date issued?

A: I agree this is confusing. The ISSUE DATE as shown on the document is misleading and I will refer it. The most current date of the LEO Guide is, ISSUE DATE: July 1997. However, it was distributed September 10, 1997.

4. Why do the BellSouth guides indicate directory listings are prohibited on unbundled loop orders? The LSOG shows directory listings as optional for unbundled loops.

A: Unbundled Loops with Interim Local Number Portability do require directory listings. However, Loop w/o ILNP does not require a directory

listing. If you have specific pages in the ordering guide that conflict with this information let me know and I will refer to the appropriate SME.

5. Port/Loop combinations are not in the LEO Guide Volume 3. How can these be ordered.

A: A separate document was sent to Brian Murdoch in Andri Weathersby's group indicating how to submit the LSR for this combination. I will forward this document to the appropriate SME to see if it can be included in the LEO Guide.

Alan, if you agree I will provide you a status on 10/16 on the following:

- \* Date to expect Multiserv, LightGate and Megalink on web
- \* Acknowledgment from Documentation Group that ISSUE DATE is to be the Month/Year document is distributed
- \* Document to order Port/Loop Combs on web

If there is anything I have overlooked, please let me know.

Thanks,

Judy

**Alan Anglyn**

**From:** MCI [Alan.Anglyn@MCI.com]  
**Sent:** Wednesday, October 08, 1997 1:11 PM  
**To:** 'Judy.Rueblinger1@bridge.bellsouth.com'  
**Cc:** Bryan Green (E-mail); Cliff Bowers (E-mail)  
**Subject:** RE: BellSouth Ordering Guides

Judy,

Thank you for your response to the questions below. I do have a follow up question, a request to modify the 10/16 status, a new question and a comment on the port/loop combination response.

#### Follow Up Question

The follow up question concerns item number 4 below. That is the one on directory listings for unbundled loops.

Your response indicates directory listings are not required for ordering of loops. I think you are saying they are optional, but I want to be sure. The response that they are not required does not provide clarification since "not required" applies for both optional and prohibited.

And, yes, BellSouth's documentation is inconsistent. The Form Information and Ordering Rules section of the Local Service Ordering Process guide shows the DLR as prohibited for Loop Service orders. The superseded Local Interconnection and Facility Based Guide indicated in the Introduction to Unbundled Loop Services that a Directory Listing Request may be required for loop service orders. There is an apparent conflict between current documentation and the former documentation. I would seem that directory listings should be considered optional since a CLEC may want customers' supported via unbundled loops to be listed in the ILEC directory.

#### Request To Modify The 10/16 Status

Regarding the 10/16 status, I would like to expand that to be that a date will be given for documenting on the web all of the products that were inadvertently omitted.

#### New Question

My new question has to do with the QuickService information that has been added to LENS. There is a carrier notification on the web about this and a release note in LENS about it. However, I could not find it documented in the LENS User Guide. What is QuickService? How is it depicted in LENS? And, how will it help in determining due dates? Where can I find more information on this?

#### Comment On The Port/Loop Combination Response

Concerning the port/loop combination response, I have gotten a copy of the document from Brian Murdoch. I have not yet had an opportunity to review it but expect to get to it soon.

I am OK with 10/16 for the status of the items in your note. I would like to have a response on the directory listing for unbundled loops question and a response to the QuickService question sooner since the unbundled loop question is still outstanding from 9/25 and the QuickService information is in production today. For these two items, I would like a response by 10/10.

Again, I want to express my thanks to you. Feel free to call me with any questions on this. I am at (404) 267-5587.

Thank you,  
Alan

**Alan Anglyn**

**From:** MCI [Alan.Anglyn@MCI.com]  
**Sent:** Thursday, September 25, 1997 2:27 PM  
**To:** Judy Rueblinger (E-mail)  
**Cc:** Bryan Green (E-mail); Cliff Bowers (E-mail)  
**Subject:** BellSouth Ordering Guides

Judy,

Following are a few questions regarding BellSouth ordering documentation. I would appreciate a response by October 1.

- ☐ There are products that were in the Resale Ordering Guide (ROG) that are not in the Information Package for Resale Interconnection Services. Given that the on-line guides replace the ROG, there appears to be a gap in what is covered in the on-line guides. Some examples are Multiserv, Lightgate, and Megalink. What is the reason for this omission?
- ☐ Now that a BellSouth EDI format is available for ISDN BRI and Synchronet, can these products be ordered without first going through the account team? The Information Package for Resale Interconnection Services states ISDN BRI forms should be submitted to the account team. Synchronet is not in the Information Package for Resale Interconnection Services; however, in the ROG it was listed as a product ordered via the account team.
- ☐ Why were sections of the LEO guide issued in September with an Issue Date of July? Shouldn't these show the date of the actual date issued?
- ☐ Why do the BellSouth guides indicate directory listings are prohibited on unbundled loop orders? The LSOG shows directory listings as optional for unbundled loops.
- ☐ Port/loop combinations are not in the LEO Guide volume 3. How can these be ordered?

Thanks,  
Alan  
(404) 267-5587

**SFO-DOC**

**From:** Arthur, Helen (MCI) [Helen.Arthur@mci.com]  
**Sent:** Wednesday, September 24, 1997 3:04 PM  
**To:** 'Clifford H. Bowers'; 'Judy Rueblinger'  
**Cc:** 'Bryan Green'; 'Pamela.Lee'  
**Subject:** EDI Testing

Cliff,

The results of the EDI testing meeting on 9/23/97 indicate that development is required on both sides before EDI testing can proceed. It is critical that modifications are completed within 24 hours in order to remain on target. Martha Romano discovered yesterday afternoon (after the 3:30 pm call) that her application is not mapping to what is documented in the LEO guide for Tax information. This means that some manual effort will need to be utilized in order to "push" test cases through the application until BST makes needed changes to map its application to its documentation.

Let me know as early today as possible (before the 3:30 call) when BellSouth will have its development completed.

Thanks,  
Helen Arthur  
Southern Financial Operations  
V825-6580

404-267-6580  
1-888-866-2376 pager



Corporation  
780 Johnson F  
Suite 500  
Atlanta, GA 30342

August 20, 1997

Mr. Cliff Bowers  
BellSouth  
1960 west Exchange Place Ste. 420  
Tucker, GA 30084

Cliff,

In reviewing the latest LEO which we received on August 5, 1997, I noticed that the UNE section has been placed in its own section. In that section it mentions the fact that multiple forms are required for ordering UNEs. In that same section it also mentions that these necessary forms are forthcoming with the next edition of the BellSouth Local Exchange Ordering (LEO) Implementation Guide.

Based on that information I have the following questions:

- ☐ When will the forms be available for CLECs to use to order these UNEs?
- ☐ In the interim, how do we order these services including the process that should be used (i.e. where should we send the order, how we you communicate back, etc.)?
- ☐ Since ordering the elements will be manual, when will they be incorporated into the EDI ordering process?
- ☐ For the UNEs that are not included in this guide, what is the process for ordering those elements?
- ☐ What is the overall interval that we should expect UNE orders to be completed?

Answers to these questions are important and will allow us to complete our work for UNEs. Therefore, I would like a response to these questions no later than COB August 27, 1997.

Your immediate attention to this matter is appreciated.

Respectfully,



Bryan K. Green  
Sr. Manager -OSS  
404-267-5515

SEP 1 5 1997

**SUPPLEMENTAL RESPONSE TO DATA REQUEST  
NO. 9**



BellSouth Interconnection Services  
Suite 420  
1960 West Exchange Place  
Tucker, Georgia 30084

770 492-7500  
Fax 770 621-0632

MCI Account Team

February 23, 1998

Mr. Bryan Green  
MCI Telecommunications  
2520 Northwinds Parkway  
Alpharetta, Ga. 30004

Dear Bryan,

This letter is responding to MCI's verbal request made during the January 23, 1998 OSS meeting, requesting that BellSouth provide a data dictionary to be used for CGI. The data dictionary, as you explained, would help MCI determine how to interpret or "break up" data sets.

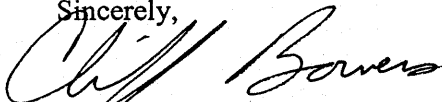
According to our programmers, the information normally contained in a data dictionary is contained in the CGI technical specifications document that BellSouth provided MCI in December. Thus, BellSouth does not believe that preparing a separate data dictionary would serve any useful purpose, particularly since MCI's programmers should have all the information they need to complete their development efforts with respect to CGI.

However, if your programmers have questions about the technical specifications or need assistance with parsing, please let me know. As we discussed previously, I will be available to arrange a joint technical meeting to discuss this and any other CGI concerns you have.

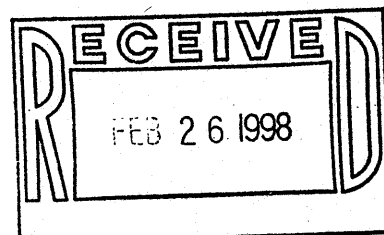
In the meantime, we have enclosed an example of output specifications when the user is performing the "Validate Address" function. The data used in this example was taken from the December 15, 1997 CGI technical specifications document, starting on page 8. You will see that the example identifies the data fields, their allowable length and the allowable character types (e.g., alpha or numeric) which is the same information included in a data dictionary.

When MCI is ready to schedule the joint technical meeting please let me know. In the meantime, if you have any additional questions don't hesitate to call me.

Sincerely,

  
Clifford Bowers

Attachment





# CGI Technical Specifications

## (Example of Input/Data Output)

(EXAMPLE) (CGI Technical Specifications document, 12/15/97, Page 8)

### 3.2 Input/Output Requirements for Street Address Validation

In this section the input/output requirements for street address validation are provided. Street address validation is the precursor to all other preorder functionality. The non-error flow is as follows: address validation selection (3.2.1), address validation (3.2.2), address validation acknowledgment (3.2.3). In the case of any possible error response, the response and appropriate action are described.

#### 3.2.1 Street Address Validation Request

Notify the CGI server that the application wishes to perform street address validation.

##### 3.2.1.1 Input Specification

There are two possible input specifications. The first, simply notifies the CGI server that the application wishes to perform street address validation. The second passes a telephone number and state to the CGI server as the "address" to validate.

The pertinent HTML for this page is as follows:

```
<INPUT maxlength=18 size=18 type=text name="telephoneNumber">
<INPUT maxlength=36 size=36 type=text name="circuitNumber">

<SELECT name="stateAbbr"><OPTION value=" "> </OPTION><OPTION value="AL"
">AL </OPTION><OPTION value="FL-North">FL-North</OPTION><OPTION
value="FL-South">FL-South</OPTION><OPTION value="FL-Southeast">FL-
Southeast</OPTION><OPTION value="GA-Atlanta">GA-Atlanta</OPTION><OPTION
value="GA-Outstate">GA-Outstate</OPTION><OPTION value="KY " ">KY
</OPTION><OPTION value="LA " ">LA </OPTION><OPTION value="MS " ">MS
</OPTION><OPTION value="NC " ">NC </OPTION><OPTION value="SC " ">SC
</OPTION><OPTION value="TN " ">TN </OPTION></SELECT>
```

Send street address validation request:

POST *InquiryScreenURL* HTTP/1.0

Content-type: application/x-www-form-urlencoded

*inquiryOption=Validate+Address&TelephoneNumber=&StateAbbr=&OK=OK*

**Note:** *InquiryScreenURL* is obtained from the action attribute in the form in the response from the main screen access.

Send telephone number to be validated.

POST *InquiryScreenURL* HTTP/1.0

Content-type: application/x-www-form-urlencoded

`InquiryOption=Validate+Address&TelephoneNumber=TelephoneNumber&StateAbbr=stateAbbr&OK=OK`

**Note:** `inquiryScreenURL` is obtained from the action attribute in the form in the response from the main screen access. `telephoneNumber` is a 10 digit telephone number containing no delimiting characters, and `stateAbbr` is a two letter USPS state abbreviation (all capitals). If no telephone number is sent, the telephone number and state field names (`telephoneNumber`, `stateAbbr`) are included but no value is passed with them. Please note that the state abbreviation (`stateAbbr`) must correctly match the option presented for `StateAbbr` according to the HTML above.

**Return to Main Menu:**

`POST InquiryScreenURL HTTP/1.0`

`Content-type: application/x-www-form-urlencoded`

`Cancel=Cancel`

**Note:** This action can be performed substituting the URL from the given form, for any form that contains a Cancel button.

### 3.2.1.2 Output Specification

The two inputs result in two different outputs. The first input returns an action that requires a street address or telephone number to be input. The second input causes the telephone number to be validated. It returns an action that expects an acknowledgment of the validated telephone number.

**Action requiring an address to be input:**

The URL for the next CGI and the required data fields are obtained from the following form in the page.

```
<FORM method=post action="ValidateAddrURL">
```

```
<INPUT size=8 maxlength=8 type=text name="BasicStreetAddressNumber">
```

```
<INPUT size=44 maxlength=44 type=text  
name="BasicStreetAddressStreetName">
```

```
<INPUT size=4 maxlength=4 type=text name="BasicStreetAddressSuffix">
```

```
<SELECT name="BasicStreetDirPrefix">
```

```
<OPTION></OPTION><OPTION>E</OPTION><OPTION>N</OPTION><OPTION>NE</OPTION>  
<OPTION>NW</OPTION><OPTION>S</OPTION><OPTION>SE</OPTION><OPTION>SW</OPTI  
ON><OPTION>W</OPTION>
```

```
</SELECT>
```

```
<SELECT name="BasicStreetAddressThor">
```

```
<OPTION></OPTION><OPTION>ALY</OPTION><OPTION>ANX</OPTION><OPTION>ARC</OP  
TION><OPTION>AV</OPTION><OPTION>BEND</OPTION><OPTION>BLK</OPTION><OPTION  
>BDWK</OPTION><OPTION>BLVD</OPTION><OPTION>BR</OPTION><OPTION>BTM</OPTIO  
N><OPTION>BYP</OPTION><OPTION>CSWY</OPTION><OPTION>CTR</OPTION><OPTION>C  
IR</OPTION><OPTION>CV</OPTION><OPTION>CT</OPTION><OPTION>CRES</OPTION><O  
PTION>CRK</OPTION><OPTION>CRSG</OPTION><OPTION>DR</OPTION><OPTION>ESPLND  
</OPTION><OPTION>EST</OPTION><OPTION>EXPWY</OPTION><OPTION>EXT</OPTION><  
OPTION>FRK</OPTION><OPTION>FRWY</OPTION><OPTION>GRDN</OPTION><OPTION>HBR  
</OPTION><OPTION>HL</OPTION><OPTION>HLS</OPTION><OPTION>HT</OPTION><OPTI  
ON>HTS</OPTION><OPTION>HWY</OPTION><OPTION>HOLW</OPTION><OPTION>ISL</OPT  
ION><OPTION>JCTN</OPTION><OPTION>LK</OPTION><OPTION>LDG</OPTION><OPTION>  
LN</OPTION><OPTION>LOOP</OPTION><OPTION>MNR</OPTION><OPTION>MKT</OPTION>
```

```

<OPTION>MT</OPTION><OPTION>MTN</OPTION><OPTION>NK</OPTION><OPTION>PASS</
OPTION><OPTION>PATH</OPTION><OPTION>PK</OPTION><OPTION>PKWY</OPTION><OPT
ION>PR</OPTION><OPTION>PKE</OPTION><OPTION>PL</OPTION><OPTION>PLZ</OPTIO
N><OPTION>PT</OPTION><OPTION>PD</OPTION><OPTION>PROM</OPTION><OPTION>PVT
</OPTION><OPTION>DR</OPTION><OPTION>RDG</OPTION><OPTION>RD</OPTION><OPTI
ON>RDWY</OPTION><OPTION>RT</OPTION><OPTION>ROW</OPTION><OPTION>RUN</OPTI
ON><OPTION>SQ</OPTION><OPTION>STA</OPTION><OPTION>ST</OPTION><OPTION>TER
</OPTION><OPTION>THRWY</OPTION><OPTION>TRC</OPTION><OPTION>TR</OPTION><O
PTION>TRNPK</OPTION><OPTION>VLG</OPTION><OPTION>WK</OPTION><OPTION>WAY</
OPTION><OPTION>WHF</OPTION><OPTION>YD</OPTION>

```

```

</SELECT>

```

```

<SELECT name="BasicStreetDirSuffix">
<OPTION></OPTION><OPTION>E</OPTION><OPTION>N</OPTION><OPTION>NE</OPTION>
<OPTION>NW</OPTION><OPTION>S</OPTION><OPTION>SE</OPTION><OPTION>SW</OPTI
ON><OPTION>W</OPTION>

```

```

</SELECT>

```

```

<SELECT name="SupplementalAddressUnitType">
<OPTION></OPTION><OPTION>APT</OPTION><OPTION>LOT</OPTION><OPTION>RM</OPT
ION><OPTION>SLIP</OPTION><OPTION>SUIT</OPTION><OPTION>UNIT</OPTION>

```

```

</SELECT>

```

```

<INPUT type="text" size=10 name="SupplementalAddressUnitData">

```

```

<SELECT name="SupplementalAddressElevationType">
<OPTION></OPTION><OPTION>FLR</OPTION>

```

```

</SELECT>

```

```

<INPUT type="text" size=10 name="SupplementalAddressElevationData">

```

```

<SELECT name="SupplementalAddressStructureType">
<OPTION></OPTION><OPTION>BLDG</OPTION><OPTION>PIER</OPTION><OPTION>WNG</
OPTION>

```

```

</SELECT>

```

```

<INPUT type="text" size=10 name="SupplementalAddressStructureData">

```

```

<INPUT backgroundcolor=ff1e2b maxlength=32 size=32 type="text"
name="CommunityName">

```

```

<SELECT name="StateAbbr">
<OPTION></OPTION><OPTION>AL</OPTION><OPTION>FL</OPTION><OPTION>GA</OPTION><OPTI
ON><OPTION>LA</OPTION><OPTION>MS</OPTION><OPTION>NC</OPTION><OPTION>SC</
OPTION><OPTION>TN</OPTION>

```

```

<INPUT size=50 maxlength=50 type="text" name="DescriptiveAddressName">

```

```

<INPUT size=2 maxlength=2 type="text" name="BasicStreetAddressRoute">

```

```

<INPUT size=8 type="text" name="BasicStreetAddressBox">

```

```

<INPUT type="text" size=24 name="TelephoneOrCircuitIdentifier">

```

```

<INPUT type="submit" value="Validate" name="validate">

```

```

<INPUT type="submit" value="Cancel" name="Cancel">

```

```

</FORM>

```

Action requiring an acknowledgment of a validated telephone number.

There are two forms returned on this page. The first is identical to the form returned in response to an address validation request. This form is populated with the value of the submitted telephone number and the submitted state. The second form is the acknowledgment of a validated address form. The second form contains the URL of the next CGI process and the name of the variables that must be passed to that CGI.

```
<FORM method=post action="SuccessfulValidationURL">  
<INPUT type=hidden name="UnparsedStreetAddressStr" value="StreetAddr">  
<INPUT type=submit value="OK" name="OK">  
<INPUT type=hidden value="Valid Address..." name="hiddenValidAddr">  
</FORM>
```

If this is the output received, proceed to section 3.2.3 for the requirements of successful street address validation acknowledgment.

**Return to Main Menu:**

See 3.1.2.2.

## SFO-DOC

**From:** Alan Anglyn [Alan.Anglyn@MCI.com]  
**Sent:** Wednesday, December 17, 1997 6:59 PM  
**To:** Beverly Gordon (E-mail); Michael Willis (E-mail)  
**Subject:** FW: Loss Notification/LNP Meeting/TCIF 7 Meeting/CGI

F/R OSS

-----Original Message-----

**From:** Clifford H. Bowers [SMTP:Clifford.H.Bowers@bridge.bst.bls.com]  
**Sent:** Friday, December 12, 1997 1:46 PM  
**To:** Alan Anglyn  
**Cc:** Beth G. Craig; Bryan Green; Marcia Moss; Judy Rueblinger; Bob Siegel; Linda W. Tate  
**Subject:** Loss Notification/LNP Meeting/TCIF 7 Meeting/CGI

Alan,

We appreciate your and Bob's participation in the change management meeting yesterday. You did a great job in representing MCI's needs. The following is a status of the items we discussed following the meeting with Linda Tate.

1) Loss Notification Enhancements: Linda said she has already submitted a change request to develop a plan and schedule for MCI's request to include daily notifications and partial disconnect data as part of the loss notification process over NDM. She also agreed to begin looking at how we can address MCI's request to be notified of UNE losses, ie., ports, loops, etc. We have scheduled a conference call with you for 10:30 a.m. on 1/6/97 to discuss the status and plans to address these enhancements as well as clarify MCI's needs and expectations in this area.

2) LNP Meeting: As regards your request to discuss LNP and how BST will handle from an EDI standpoint LNP orders prior to TCIF 8, Linda referred me Beth Craig. I have a call into Beth to see if she can join us for our 1/7/97 OSS meeting. I will let you know as soon as I hear from her. Linda will advise what two LNP data elements are already mapped or will be contained in the TCIF issue 7 map.

3) TCIF 7 Specifications Review Meeting: We have tentatively agreed to meet 1/21/98 and 1/22/98 to review the TCIF 7 specifications including rejects/clarifications (1st day) and loop/ports (2nd day). In this meeting we will review with you and your SMEs the mapping, etc., required for TCIF 7. As Linda stated yesterday, LNP and 4 UNEs (Loop, Port, INP, and LINP) have already been mapped, and we will be prepared to discuss all except for LNP (since it will have already been addressed in 2 above) in the meeting. Please confirm if MCI can meet those days or whether we should look at other dates.

4) CGI Specifications: We will provide you the CGI release 1.1 specifications on 12/15. We need to know as quickly as you can provide, what MCI's desired schedule for implementation will be (in order to provide implementation support if needed) and the name and version of the web screen scraping tool MCI will use with this application.

Please let me know if you have any questions.  
Cliff

1000

Date: Thu Nov 13, 1997 02:47 pm EST  
Source-Date: Thu, 13 Nov 1997 14:43:40 -0500  
From: "Bryan.Green@mci.com"  
EMS: INNERMAIL / MCI ID: 208-7612  
MBX: Bryan.Green@mci.com  
  
TO: "'Clifford.H.Bowers'"  
EMS: INNERMAIL / MCI ID: 208-7612  
MBX: Clifford.H.Bowers@bridge.bellsouth.com  
CC: "Pamela.Lee"  
EMS: INNERMAIL / MCI ID: 208-7612  
MBX: Pamela.Lee@bridge.bellsouth.com  
CC: "Judy.Rueblinger1"  
EMS: INNERMAIL / MCI ID: 208-7612  
MBX: Judy.Rueblinger1@bridge.bellsouth.com  
CC: "Bob.Siegel"  
EMS: INNERMAIL / MCI ID: 208-7612  
MBX: Bob.Siegel@bridge.bellsouth.com  
CC: "'Alan Anglyn [Alan.Anglyn@MCI.Com] [E-mail]"  
EMS: INNERMAIL / MCI ID: 208-7612  
MBX: Alan.Anglyn@mci.com  
CC: "'Anna Hopkins [Anna.Hopkins@MCI.Com] [E-mail]"  
EMS: INNERMAIL / MCI ID: 208-7612  
MBX: Anna.Hopkins@mci.com  
BCC: \* Ron Martinez / MCI ID: 357-0919  
Subject: RE: CGI  
Message-Id: 97111319470933/INTERNETGWDI1IG  
Source-Msg-Id: <01BCF042.89552E20.Bryan.Green@mci.com>  
U-Organization: MCI

Cliff,

After reviewing the attached CGI specifications, we have determined that they are the same specifications that we received on 9/5/97. Your note mentions that release 1.1 will be available in the next four weeks or so. In order for our developers to evaluate the specs as quickly as possible, we would need a more accurate availability date as well as a list of the enhancements release 1.1 will support.

Please let me know if you will be able to provide me with the requested information by 11/20/97. If you are unable to meet this date, please let me know when I can expect to receive.

Bryan

-----Original Message-----

From: Clifford.H.Bowers [SMTP:Clifford.H.Bowers@bridge.bellsouth.com]  
Sent: Friday, November 07, 1997 5:24 PM  
To: Bryan Green  
Cc: Pamela.Lee; Judy.Rueblinger1; Bob.Siegel  
Subject: CGI

<< Message: CGI >> Bryan,

Attached are the release 1.0 CGI specifications. These should give your folks

something they can begin working with. Also notice that Bob should have release 1.1 specifications in around four weeks.

Thanks,

Cliff



## SFO-DOC

---

**From:** Bryan K. Green [Bryan.Green@mci.com]  
**Sent:** Friday, November 07, 1997 6:02 PM  
**To:** 'Arthur, Helen (MCI)'; 'Beverly.Gordon@mci.com'  
**Cc:** 'SFO-DOC - Michael Willis'; 'Wally Schmidt'  
**Subject:** FW: CGI



WEBAC ~ 51.DOC

Fyi,

Beverly please file in the CGI/Screen Scrapping file. This has already been sent to Anna and Alan

Bryan

-----Original Message-----

**From:** Bob.Siegel@bridge.bellsouth.com  
[SMTP:Bob.Siegel@bridge.bellsouth.com]  
**Sent:** None  
**To:** Clifford.H.Bowers@bridge.bellsouth.com  
**Subject:** CGI

Cliff:

Attached are the CGI specifications, release 1.0. These specifications will give MCI the capability to build their screen scrapping application.

Release

1.1 of these specifications is currently in development and will be released in approximately 4 weeks. This release will give MCI added capability to match some new fields that have recently been added in LENS.

I will forward release 1.1 to you when it is complete.



MCI Telecommunications  
Corporation

780 Johnson Ferry Road  
Suite 500  
Atlanta, GA 30342

September 5, 1997

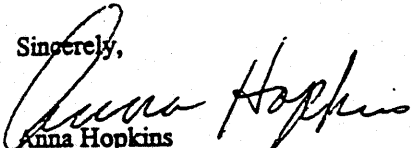
Mr. Cliff Bowers, Sales Director  
BellSouth Telecommunications  
1960 West Exchange Place, Ste. 420  
Tucker, GA 30084

Cliff,

Per the LENS Access Technical Specification, the LENS application can be accessed directly by other computer systems. Based on that fact, MCI would like to meet with BellSouth and develop the interface that would provide us with that access. The specifications we have are dated 9/5 and per the documentation it supports the 4/22/97 release of LENS. In order to develop this interface we need the latest technical specification which includes all the LENS upgrades (eg csr). We'd like an updated copy to review prior to the meeting.

We will be available to meet via conference call on September 15, 17, or 18. Please let me know which date is best for you and your technical SME. You may direct your questions to me on 404-267-6593.

Sincerely,

  
Anna Hopkins  
Local Systems Implementation Specialist

Linda 7/5/97



BellSouth Interconnection Services

Memorandum

File Code  
Date July 8, 1997  
  
To Bryan Green  
Telephone number 404-267-5515  
Fax number  
  
From Ilene Barnett  
Telephone number 770-492-7525  
Fax number  
  
Subject LENS Access Technical Specification

Enclosed is the document you requested beginning on May 16, 1997. This document was provided to me with the caveat that it had not been updated to match the current LENS application. I will work with Linda Tate to provide you an updated copy as soon as it is available.

I apologize for the length of time in responding to your request. Please don't hesitate to call me if you have additional questions or would like to have more discussions on this subject.

cc: Linda Tate (w/o attachment)  
Don Stewart (w/o attachment)



MCI Telecommunications  
Corporation

780 Johnson Ferry Road  
Suite 500  
Atlanta, GA 30342

June 26, 1997

Ms. Ilene Barnett  
BellSouth Interconnection  
1960 West Exchange Place Ste. 420  
Tucker, GA 30084

Ilene,

This letter is to request status of the LENS technical specifications that MCI requested in writing on May 16, 1997.

Based on the lack of response from BST on this issue, we will assume that the technical specifications are not available. The lack of technical specifications has caused MCI significant delay with respect to interface development.

Please provide status on the LENS technical specifications by Wednesday, July 2, 1997. Your prompt response to this matter will be greatly appreciated.

Bryan Green  
Sr. Manager  
Systems Implementation  
404-267-5515

cc: Pam Lee  
Marcel Henry  
Georjean Simmons



780 Johnson Ferry Road  
Suite 500  
Atlanta, GA 30342

June 4, 1997

Ms. Ilene Barnett  
BellSouth  
1960 west Exchange Place Ste. 420  
Tucker, GA 30084

Ilene,

I recently received a certified letter from you stating that MCI was working with BST to pursue the technical specifications that would allow MCI to build an interface to LENS. Per our conversation this afternoon, this is not correct. The discussions underway between MCI and BST are to facilitate the provisioning of connection between our gateways to allow MCI to access LENS via our LAN.

Since writing the original request on May 16, 1997, I have not received a response or any status on the availability of the documentation. Again, the longer the delay on receiving this information the greater the impact on our ability to develop the interfaces in a timely manner.

We are awaiting your response on this matter.

Bryan Green  
Sr. Manager  
Systems Implementation  
404-267-5515

May 16, 1997

Ms. Ilene Barnett  
BellSouth  
1960 west Exchange Place Ste. 420  
Tucker, GA 30084

Ilene,

I have recently had an opportunity to review the LENS material BST provided MCI on 5/12/97. While going through the material, I noticed that the USER guide was the only documentation provided. Two vital pieces of information are still missing: documentation on how to connect to LENS (i.e. the steps necessary and the forms required to physically gain connectivity to LENS) and the technical specifications that would allow MCI to build an interface to LENS.

These documents are necessary for MCI to complete its assessment of LENS. Please provide me with an idea of when I can expect to receive these documents.

I will follow this email up with a letter addressed to you.

Bryan Green  
Sr. Manager  
Systems Implementation  
404-267-5515

**SUPPLEMENTAL RESPONSE TO DATA REQUESTS  
NO. 6 AND 9**



W. Scott Schaefer  
President Interconnection Services  
Suite 4511  
675 West Peachtree Street, N.E.  
Atlanta, Georgia 30375

February 11, 1998

Marcel Henry  
Regional Vice President  
Southern Financial Operations  
Two Northwinds Center - 5th Floor  
2520 Northwinds Parkway  
Alpharetta, GA 30004

Dear Mr. Henry:

This is a follow-up to Mark Feidler's January 8, 1998 letter in which he stated that BellSouth would provide a point-by-point response to the issues raised in your December 24, 1997 letter. As he mentioned in his initial response, BellSouth strongly disagrees with MCIm's assertion that BellSouth's position on these issues in any way affects MCIm's entry into the local market.

BellSouth's response to each of the issues raised in your letter are set forth below. Please note, however, that by responding to the issues as posed, BellSouth is not consenting to MCI's characterization of the November 19, 1997 Order of the Florida Public Service Commission in BellSouth's Section 271 proceeding (the "Florida Order").

BellSouth strongly disagrees with MCI's characterization that BellSouth's electronic interface product line contains deficiencies. The electronic interfaces were developed and implemented pursuant to BellSouth's contractual obligations, existing industry standards, the technical capabilities then available to BellSouth. BellSouth is proud of the development it has done in this area.

**Issue 1 OSS:**

**A. General Requirements**

BellSouth has provided access to the ordering, pre-ordering, and repair databases required by the Florida Commission in the MCIm arbitration proceeding and has met the requirements imposed by the Interconnection Agreement. Therefore, there is no legal obligation to comply with the overly broad and burdensome request stated in MCI's December 24, 1997 letter. The obligation regarding access to BellSouth's operating support systems through electronic interfaces is found in Attachment VIII, Section 2.1.1.1. BellSouth is in compliance with that section. BellSouth is continually planning, as standards become available, upgrades, refinements and additions to its electronic interface product line. Both the API/Corba gateway and EDI/SSL3 interface have been conditionally recommended by the ECIC with an indication that API/Corba will be the long-term recommendation. BellSouth is advancing in its development of API/Corba and would be delighted to discuss its plans with MCI.



**B. Pre-ordering****1) LENS requires multiple address validations for the same fields in different screens**

This is not the case in the firm order mode. Address validation is a necessary input for other pre-ordering functions and can be accomplished in a matter of seconds. For example, the list of telephone numbers that can be offered to a particular customer is driven by the set of available numbers in the central office serving that customer's address, which is determined during the course of address validation. The inquiry mode includes address validation for telephone number selection, product and service availability, and due date information, because associating a central office with an address is a prerequisite for each of these functions, and in the inquiry mode, each of these functions can be performed independently. This does not have a negative impact on the CLECs' ability to obtain pre-ordering information; rather, it allows CLECs to choose which particular pre-ordering functions they desire without having to go through all available options.

In a continuing effort to be responsive to CLECs' requests and suggestions, BellSouth, as of February 2, 1998, provided a modified inquiry mode that eliminates multiple address validations.

With respect to your request for a download of the RSAG database, BellSouth disagrees with MCI's assertion that the BellSouth-MCI Interconnection Agreement entitles MCI to a download of RSAG. MCI is entitled to electronic access to the RSAG database and BellSouth provides that access via LENS. BellSouth will provide access through the API gateway when API becomes available. BellSouth provided a proposal to MCI for extracts of the RSAG on a daily basis for a fee. MCI rejected that proposal and raised this issue in a complaint to the Georgia PSC. This issue is now being addressed in that proceeding for the Georgia Interconnection Agreement.

**2) No on-line customer credit checking capability and limited availability of customer service records**

BellSouth currently meets all contractual obligations regarding access to customer service records including credit history. The obligation regarding credit history is contained in Attachment VIII of the Interconnection Agreement.

EC-Lite and LENS provide CLECs with on-line access to view and print customer service record information in substantially the same time and manner as BellSouth retail service representatives. The CLEC can obtain, via the EC-Lite and LENS pre-ordering interfaces, Customer Service Record (CSR) information. Using this capability and with the same condition regarding page limitations as experienced by BellSouth retail operations, the CLEC can obtain account information on-line for customers. The LCSC will continue its customer support function of providing account information where conditions impose page limitations.

**3) BellSouth can reserve more telephone numbers than ALEC's**

The 100 telephone number limit was removed effective January 15, 1998.

**4) Cumbersome and insufficient methods of locating long distance company, and product and service information selected by customer.**

The Local Exchange Ordering Implementation Guide contains the required products and services USOCs/ordering codes and valid combinations that constitute business rules. Additionally, BellSouth is providing interested CLECs an electronic copy of the extensive edits used by SOCS. Further, effective January 20th, CLECs can access via the Internet the entire non-proprietary list of USOCs. PIC codes are shown randomly per a regulatory equal access requirement.

5) LENS does not provide access to calculated due dates in the inquiry mode

The use of the due date calendar in the inquiry mode is in compliance with BellSouth's contractual and parity obligations.

LENS calculates a due date as part of a firm order, which is the same situation in which BellSouth's retail systems actually calculate a due date. The installation calendar tables used to calculate the due date are shown in the inquiry mode as well. The installation calendar also is accessed separately by BellSouth's retail service representatives to respond to retail customer inquiries.

C. Ordering and Provisioning

1) EDI does not have electronic edit capability at parity with BellSouth's RNS and DOE systems.

BellSouth will handle all rejects mechanically by March, 1998. This capability will be based on BellSouth requirements developed in advance of the national standards. BellSouth can currently perform 88% of all mechanized rejects as of November, 1997.

2) No order summary screen exists in EDI as in RNS

BellSouth does make a summary screen available in EDI.

3) ALECs cannot access or make changes to pending orders.

CLECs currently have the capability to do a single "C" (change) order. As of January 30, 1998, the extensive SOER edits were distributed on disk, and copies of the LEO and LESOG edits were given to the CLECs.

CLECs can submit supplemental orders, or changes to pending orders, via the 860 transaction. Currently, 860s are handled manually in substantially the same time and manner as 860s are handled for BellSouth's retail customers. As of March 16, 1998, 860s will be handled mechanically.

4) BellSouth has not provided requesting carriers with the technical specifications of the interfaces

To the best of BellSouth's knowledge and belief, BellSouth has, to date, provided MCI with all technical specifications for requested interfaces. As MCI indicated, BellSouth provided MCI the updated CGI specification on December 15, 1997. Apparently, these are still under review by MCI.

5) Interfaces are not fully electronic or integrated, and require manual interventions

02/13/98 16:01

FEIDLER-113

(i) As stated previously, BellSouth has met the contractual obligations regarding electronic interfaces as set forth in Attachment VIII. MCI requested supplemental orders be processed mechanically and EDI can process supplemental orders mechanically.

(ii) With respect to your request for the automation of ordering complex services, that is an Ordering and Billing Forum (OBF) issue. BellSouth does not have the capability for mechanical ordering of complex services itself. There are no industry standard for MCI's request. MCI can take this issue to the OBF for resolution.

(iii) BellSouth currently does not determine if a loop or line is Basic Rate ISDN capable prior to issuing a service order. BellSouth makes the determination on BRISDN compatibility after the service order is received. If a loop or line is not compatible the order drops out and will be evaluated by the local outside engineering plant district. Normal service order coordination occurs subsequent to this.

(iv) BellSouth does offer mechanized ordering and mechanized order generation for loops and ports. BellSouth is progressing on the development of the necessary ordering and provisioning capabilities for loop/port combinations in accordance with applicable state regulatory requirements and the terms of the interconnection agreement with MCI. However, there is no industry standard available.

(v) As for the mechanical processing of POTS resale orders, BellSouth has submitted evidence in OSS and Performance Measurements affidavits and exhibits filed with PSCs and the FCC demonstrating that CLECs can achieve flow-through rates exceeding 95% - if they use the systems correctly. This success rate is dependent on how well the CLEC's service representatives are trained.

#### 6) Sufficient capacity to meet demand

The capacity requirements for BellSouth's interfaces were established by incorporating CLECs' forecasts in BellSouth's aggregated forecasts. The aggregate forecast was then used to set the capacity requirements for the interfaces. BellSouth also has undertaken capacity testing to insure that the interfaces are capable of supporting the planned volumes. This testing process has been documented in several different venues, including the recent Section 271 FCC filings for South Carolina and Louisiana. BellSouth has the capacity to handle pre-ordering transactions for more than 10,000 orders per day, and has appropriate capacity plans in place to increase capacity as the CLECs' volume increases. At present, however, there is significant excess capacity, as the highest individual day's electronic pre-ordering and ordering volume for 1997 reached approximately 3,300 orders, with associated pre-ordering transactions, which is only one-third of the initial capacity for which BellSouth planned and has tested.

#### 7) Installation intervals not at parity with BellSouth

BellSouth responds to this issue in Issue No. 7 below.

#### D. Maintenance and repair

The TAFI specifications were sent to MCI again on January 30, 1998.

#### E. Billing

BellSouth is currently billing the appropriate resale discount rates for MCI. This capability was implemented in Florida on September 20, 1997. In addition, BellSouth implemented the discounting of nonrecurring charges in Florida on September 11, 1997.

## **Issue 2 Interconnection:**

### **1. Collocation**

You have requested the methods and procedures necessary "to interconnect with other collocators who are interconnected with BellSouth in the same central office; to purchase unbundled dedicated transport from BellSouth between the collocation facility and MCI's network; to collocate subscriber loop electronics in a BellSouth central office; and to select virtual over physical collocation, where space and other considerations permit".

The requested procedures have already been made available to MCI. The procedures to purchase unbundled dedicated transport between the collocation facility and MCI's network reside in the Local Exchange Ordering (LEO) Implementation Guide which is on the BellSouth website, and in the BellSouth Collocation Handbook. BellSouth has always permitted the placement of digital loop carrier (DLC) equipment as part of a collocation arrangement given that specific DLC is considered transmission equipment. BellSouth offers CLECs both virtual and physical collocation.

### **2. Network blockage and End Office Trunking**

BellSouth responds to this issue in Issue No. 7 below.

### **3. Local Tandem Interconnection**

Consistent with the Florida Order and the BellSouth-MCI Interconnection Agreement, BellSouth will allow a CLEC to interconnect with BellSouth at a local tandem. MCI's issue, and the issue not addressed by the contract, is whether BellSouth will terminate MCI's traffic to an independent telephone company or another CLEC at the local tandem.

## **Issue 3 Unbundled Network Elements**

There are no national standards for record layouts and data elements for billing UNEs in a CABS Billing Data Tape (BDT) format. However, BellSouth will implement an interim process during April, 1998 to provide a CABS formatted UNE bill.

Although national standards for this UNE billing do not exist, BellSouth is nevertheless prepared to meet the needs of its CLEC customers. In addition, BellSouth will work cooperatively with the CLEC industry to develop the national standards through the OBF, and pursue other means of providing to all CLECs billing data that is useful.

BellSouth has the capability to provide the interstate access records to CLECs to enable them to bill Interexchange carriers for the provision of interstate access. As stated on page 74 of the Florida Order, this file is provided to "requesting CLECs". BellSouth requires contract provisions (either in the form of the Access Daily Usage File (ADUF) contract or as part of or an amendment to the existing interconnection agreement) before the ADUF will be provided.

With the files that have been generated through this process thus far, according to BellSouth's knowledge and belief, MCI has had no interstate access records that would have been provided for December, 1997, or January, 1998.

#### **Issue 4 Directory Assistance**

As you indicated, the BellSouth-MCI Interconnection Agreement states: "BellSouth shall provide to MCI, to the extent authorized, the residential, business and government subscriber records used by BellSouth to create and maintain its Directory Assistance Data Base, in a non-discriminatory manner." Attachment VIII, Section 6.1.6.1. The words "to the extent authorized" were not in the original language initially proposed by MCI. Rather, they were proposed by BellSouth, and agreed to by MCI, in recognition of the fact that certain agreements with CLECs and independent telephone companies restrict BellSouth's ability to provide this information to MCI.

BellSouth has not changed its position and believes that MCI should honor its contractual obligation.

#### **Issue 5 Reciprocal Compensation**

On January 23, 1998, BellSouth sent to MCI via overnight delivery checks totaling \$695,559.91 representing the amount claimed due for the termination of intraLATA minutes and local reciprocal compensation less the amount representing Internet Service Provider (ISP) traffic. BellSouth and MCI agreed to an additional amount of \$199,012.61, which is associated with the usage cap under the agreement that was in effect until May, 1997.

With respect to your request that BellSouth will in the future pay for ISP traffic, BellSouth's position has been made clear on this point time and time again. Internet-bound traffic is not local traffic and is therefore not eligible for reciprocal compensation. BellSouth's position has not changed.

#### **Issue 6 Resale Services**

##### **A. Services not being provided on a branded or unbranded basis to MCI**

##### **Voice Mail**

BellSouth voluntarily agreed to offer to CLECs the ability to resell BellSouth's MemoryCall® service, even though this service is not a telecommunications service. BellSouth agreed to do so but did not agree to change the service offering. BellSouth is willing to discuss and assess the development of a MemoryCall® service to include MCI custom branding.

##### **Operator Services and Directory Assistance**

BellSouth is prepared to provide operator services and directory assistance on an MCI branded basis. The interconnection agreement in Attachment VIII does, however, require selective routing.

##### **QUICKService**

BellSouth is currently in the process of changing its present QUICKService recording to:

"You can only dial '911' from this line. To reach BellSouth or another local service provider, you must call from another location."

Due to the number of BellSouth's main central offices affected by this change (approximately 800), BellSouth estimates that, barring any unforeseen obstacles, the change will be completed by February 27, 1998. BellSouth is providing QUICKService on a competitively neutral basis. Competitive neutrality does not mean BellSouth is restricted from mentioning itself on its QUICKService recording. BellSouth's QUICKService recording strikes a balance by stating that other local service providers are available while continuing to allow BellSouth an opportunity to market its services provided through its own facilities.

#### 611 Service

BellSouth will attempt to work with MCI in reaching a mutually acceptable resolution of this issue.

#### B. Parity in conversions

BellSouth believes it is in compliance with "switched-as-is" customer conversions. The due date for MCI's customers is calculated in the same manner as the due date for BellSouth's own retail customers.

### Issue 7 Performance Measurements

MCI stated that BellSouth was required to provide statistically valid commercial usage data showing:

- A. average installation intervals for resale;
- B. average installation intervals for loops;
- C. comparative performance information for unbundled network elements;
- D. service order accuracy and percent flow through;
- E. held orders and provisioning accuracy;
- F. bill quality and accuracy; and
- G. repeat trouble reports for unbundled network elements.

The seven specific items (A-G) above will be provided as part of a larger set of service quality measurements currently under development by BellSouth. These forthcoming measurements are in response to the recent requirements set forth by the Georgia Public Service Commission in Docket No. 7892-U and will meet and/or exceed the needs of all BellSouth's CLEC customers, including MCI. These measurements will provide a standard basis for comparison across the region. A complete list of the standard data to be collected and reported is set forth in the table below. BellSouth expects to have this regional data available in report format by the end of March, 1998.

The BellSouth MCI account team is currently working with representatives from MCI to develop a methodology for reporting Performance Measurements as called for in the Florida Interconnection Agreement.

## Standard CLEC/ILEC Measurements:

CATEGORY	FUNCTION
Pre-Ordering	1. Average Response Interval 2. OSS Interface Availability
Ordering	1. Firm Order Confirmation Timeliness 2. Reject Interval 3. Percent Rejected Service Requests 4. Percent Flow-through Service Requests 5. Total Service Order Cycle Time 6. Service Request Submissions per Request 7. Speed of Answer in Ordering Center
Provisioning	Order Completion Intervals 1. Average Completion Interval 2. Order Completion Interval Distribution Held Orders 3. Mean Held Order Interval Installation Timeliness, Quality & Accuracy 4. Percent Missed Installation Appointments 5. Percent Provisioning Troubles within 30 days 6. Percent Order Accuracy
Maintenance & Repair	1. Customer Trouble Report Rate 2. Missed Repair Appointments Quality of Repair & Time to Restore 3. Out of Service > 24 Hours 4. Percent Repeat Troubles within 30 days 5. Maintenance Average Duration 6. Average Answer Time - Repair Center
Billing	Invoice Accuracy & Timeliness 1. Invoice Accuracy 2. Mean Time to Deliver Invoices
Operator Services and Directory Assistance	Directory Assistance 1. Average Speed to Answer 2. Mean Time to Answer Operator Services 3. Average Speed to Answer 4. Mean Time to Answer
E911	1. Timeliness 2. Accuracy
Trunking	1. CLEC Trunk Group Service Report 2. BellSouth CTTG Blocking Report 3. Local Network Trunk Group Service Report 4. BellSouth Local Network Blocking Report

## Other:

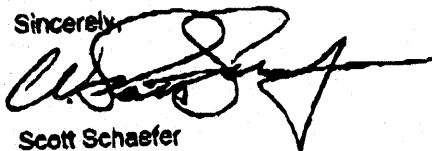
1. BST will provide state level reports only.
2. These quality measurement reports are designed to meet the requirements of the Interconnection Agreement and will be delivered in either electronic or printed format to the CLEC(s).

02/13/98 16:03

FEB 13 '98 15:42 FR MCI

I trust the above answers the issues raised in your letter. BellSouth, as it has consistently done in the past, is prepared to discuss any and all issues with MCI. To the extent you have any further questions or comments regarding BellSouth's policies or issues concerning implementation of the MCI/BellSouth Interconnection Agreement, your BellSouth Account Team Representative can assist you.

Sincerely,



Scott Schaefer





**BellSouth Telecommunications, Inc.**  
Suite 4511  
675 West Peachtree Street, N.E.  
Atlanta, Georgia 30375

404 927-7020  
Fax 404 521-2311

**Mark L. Feidler**  
President - Interconnection Services

January 8, 1998

**Marcel Henry**  
Regional Vice President  
MCI Southern Financial Operations  
Three Ravinia Drive  
Atlanta, GA 30346

Dear Mr. Henry:

This is to acknowledge receipt of your December 24, 1997, letter concerning BellSouth's provision of local service capabilities to MCI. As you are well aware, BellSouth has clearly stated its position to most, if not all, of the issues you raise in your letter in various proceedings before the FCC and various state commissions, e.g., the recent OSS Workshops in Georgia and Alabama. For your convenience, however, BellSouth will provide you with a point by point response to your letter on or before January 31, 1998.

Finally, BellSouth strongly disagrees with MCI's assertion that BellSouth's position on any of the issues raised in your letter have any effect whatsoever on MCI's ability to enter the local market.

Sincerely,

A handwritten signature in black ink, appearing to read "M. L. Feidler".

Mark Feidler



**MCI Telecom Corporation**

Three Ravinia Drive  
Atlanta, GA 30346  
770 280 7340  
Fax 770 280 7849  
Internet: 2161607@MCIEmail.Com

**Marcel Henry**  
Regional Vice President  
Southern Financial Operations

December 24, 1997

**FILE COPY**

**DISTRIBUTED**

12/24 - FEDEX  
800847264167

Mr. Mark L. Feidler  
President - Interconnection Services  
**BellSouth Telecommunications, Inc.**  
Suite 4511  
675 West Peachtree Street  
Atlanta, GA 30375

Dear Mr. Feidler:

As we have discussed, there are a number of open issues between our companies concerning BellSouth's provision of local service capabilities to MCI. Some of those issues were addressed in the Florida Public Service Commission's November 19, 1997 order rejecting BellSouth's Section 271 application and clarifying the obligations BellSouth must meet as a prerequisite to entering the in-region long distance market. The Commission addressed deficiencies in BellSouth's systems relating to Operations Support Systems ("OSS"), interconnection, unbundled network elements ("UNEs"), directory assistance, reciprocal compensation, resold services and performance measures. Although MCI does not agree with all of the conclusions reached in the order, the order provides a useful starting point in addressing some (but certainly not all) of the issues that have arisen under our Interconnection Agreement.

A discussion of the issues identified in the Florida Commission order follows. Although this discussion necessarily focuses on changes we wish to be made in Florida, we request that these changes be made outside Florida on a regionwide basis as well. Please respond to this letter by January 8, 1998. In your response, please state in detail BellSouth's plan for addressing each of the problems discussed below and confirm that these solutions will be implemented no later than January 31, 1998 (unless otherwise specified below). If it is BellSouth's position that a solution for a particular problem cannot be put in place by January 31, please provide a detailed explanation why and state when the problem will be remedied.

#### 1. OSS

##### A. General requirements

The Florida Commission required BellSouth to demonstrate that its interfaces provide nondiscriminatory access to OSS functions. The Commission identified four characteristics of a nondiscriminatory interface:

- 1) The interface must be electronic: The interface must require no more human or manual intervention than is necessarily involved for BellSouth to perform a similar transaction itself.



- 2) The interface must provide the capabilities necessary to perform functions with the same level of quality, efficiency, and effectiveness as BellSouth provides to itself.
- 3) The interface must have adequate documentation to allow an ALEC to develop and deploy systems and processes, and to provide adequate training to its employees.
- 4) The interface must be able to meet the ordering demand of all ALECs, with response times equal to that which BellSouth provides itself.

Order, pp. 97, 174. The Commission concluded that none of the OSS functions provided by BellSouth meet these criteria. As a first step in moving toward compliance, MCI requests that BellSouth provide a detailed listing of all OSS systems that BellSouth uses, along with technical specifications for each system, and a detailed listing of each of the data bases that are used by BellSouth's OSS systems, along with a description of each data base (including data base layouts). That information will enable MCI to determine the capabilities that BellSouth provides itself and thus what is required for parity of service.

#### B. Pre-ordering

The Commission determined that BellSouth must provide a pre-ordering interface that is integrated with the EDI ordering interface. Order, pp. 92, 167. As you know, MCI has sought to meet with BellSouth to discuss the implementation of an interface for pre-ordering using EDI TCP/IP SSL3 that would be integrated with the EDI ordering interface. We now repeat our request that our companies meet and begin discussing how to implement an interface using this protocol.

The Commission also noted deficiencies in the following areas:

- 1) LENS requires multiple address validations for the same fields in different screens. In accordance with the Commission's order, MCI requests that any pre-ordering interfaces offered by BellSouth not require multiple address validations. On a related point, MCI previously has requested that BellSouth provide a download of the RSAG, as required by our Interconnection Agreement, so that we may remedy other address validation problems we have encountered. In response, BellSouth has offered to sell MCI an extract from the RSAG for an amount exceeding \$500,000 plus recurring charges. Under our interconnection agreement, MCI is entitled to obtain a download of the RSAG at no additional cost, and we repeat our request that it be provided on that basis.



- 2) No on-line customer credit checking capability and limited availability of customer service records. In addition to the problems identified by the Commission, MCI notes that BellSouth's system is deficient in that BellSouth refuses to provide CSR data that it unilaterally deems to be proprietary or unnecessary. Further, CSR access is limited to fifty pages of data and CSR information is not fielded, which means that MCI cannot load and edit CSR data and use the data to generate orders. Please redress these problems.
- 3) BellSouth can reserve more telephone numbers than ALECs. BellSouth's RNS system permits it to reserve up to twenty-five numbers per order, as compared to six for ALECs. Moreover, unlike the system afforded to ALECs, RNS automatically assigns numbers for its customers and provides BellSouth representatives with lists of available NXXs. In addition, BellSouth has a list of available vanity numbers that it does not provide to ALECs. We request BellSouth afford these same capabilities to MCI.
- 4) Cumbersome and inefficient methods of locating long distance company, and product and service information selected by customer. In addition to addressing the problems specifically identified by the Commission, MCI requests that BellSouth provide via fixed format NDM a description or definition of each of its USOCs, including the required field identifiers and their descriptions and the states in which the USOCs are valid. This information should be updated on a biweekly basis and should give notice of the implementation or deactivation of a USOC forty-five days in advance.
- 5) LENS does not provide access to calculated due dates in the inquiry mode. BellSouth should provide in a system-to-system interface the capability to determine due dates efficiently and to expedite those due dates when appropriate.

#### C. Ordering and provisioning

The Commission ruled that a number of problems in BellSouth's ordering and provisioning systems require improvement. Order, pp. 83-94, 158-68. These problems are discussed below:

- 1) EDI does not have electronic edit capability at parity with BellSouth's RNS and DOE systems. Because we intend to order via EDI, we are particularly concerned with the functionality of that interface. We request that BellSouth provide the same on-line editing capability in EDI that BellSouth has for itself. On a related point, please provide a detailed description of how order rejections are handled and a list of all reasons that both fatal and non-fatal errors occur, including descriptions and error codes.

- 2) No order summary screen exists in EDI as in RNS. BellSouth should provide access to pending orders in its systems, a recap of the services ordered on the FOC and a recap of the services installed on the completion notice.
- 3) ALECs cannot access or make changes to pending orders. We request that BellSouth provide the capability to change pending orders at parity with what BellSouth provides itself. Further, please (i) provide the business rules for making changes to existing orders; (ii) the circumstances that will cause due dates to be changed on a pending order when a change is submitted; and (iii) a detailed description of the process used to make changes to pending orders.
- 4) BellSouth has not provided requesting carriers with the technical specifications of the interfaces. We have requested CGI specifications before and twice BellSouth has provided outdated specifications that are of little use. BellSouth recently has provided another set of CGI specifications that we are now reviewing. Once we have completed our review, we will inform you if further action is necessary.
- 5) Interfaces are not fully electronic or integrated, and require manual intervention. Measures needed to integrate BellSouth's and MCI's systems include (but are not limited to) the following: (i) supplemental orders should be processed mechanically without human intervention; (ii) ordering for complex services should be automated; (iii) ALECs should have systems available that allow ALECs to determine if loops and lines are ISDN capable; (iv) service orders for all unbundled loops, unbundled ports, transport and loop/port combinations should be mechanically generated and should flow through BellSouth's systems without manual intervention; and (v) the percentage of POTS resale orders processed mechanically for ALECs should be increased to equal the percentage of BellSouth POTS orders processed mechanically. Please provide MCI with these capabilities.
- (6) Sufficient capacity to meet demand. MCI concurs with the Commission's conclusion that BellSouth's system lacks sufficient capacity and requests that sufficient capacity be provided.
- (7) Installation intervals not at parity with BellSouth. Performance measures and standards are discussed below.

#### D. Maintenance and repair

The Florida Commission concluded that BellSouth must provide ALECs with the technical specifications of TAFI so that ALECs can integrate their OSS with BellSouth's OSS for maintenance and repair. Order, pp. 94-96, 168-69. Please comply with this requirement.

#### E. Billing

The Commission concluded that BellSouth cannot render accurate bills for resold services. Order, p. 171. Please remedy this problem, or, if it already has been fixed, provide the date on which it was fixed.

Because the Commission dealt with UNE billing issues together with other UNE issues, we will follow suit and deal with those issues under the UNE heading below.

### 2. Interconnection

#### 1. Collocation

The Commission notes that "in Docket No. 960846-TP, we specifically allowed MCI to interconnect with other collocators who are interconnected with BellSouth in the same central office; to purchase unbundled dedicated transport from BellSouth between the collocation facility and MCI's network; to collocate subscriber loop electronics in a BellSouth central office; and to select virtual over physical collocation, where space and other considerations permit." Order, p. 44. Please provide the methods and procedures necessary to perform these functions.

#### 2. Network blockage and End Office Trunking

The Commission required BellSouth to "provide ALECs with more frequent and better data on their traffic over BellSouth's network"; "to demonstrate that any blockages experienced by ALECs are not excessive in comparison to the blockages experienced by BellSouth"; to work together with ALECs to improve intercompany communications; and to "provide data sufficient to show that blockage levels are comparable between BellSouth and ALEC traffic." Order, p. 59. Accordingly, please provide the most recent three months of blockage data on all common trunk groups utilized for ALEC traffic that experienced blockage; for the same three month period, blockage data on all of MCI's interconnection trunk groups from your end offices and tandems to our points of termination that experienced blockage; for the same three month period, blockage data on all ALEC interconnection trunk groups from your end offices and tandems to ALEC points of termination that experienced blockage; and for the same three month period, similar blockage data on all trunks carrying BellSouth local traffic. Please provide the same information on a month-to-month basis going forward.

### 3. Local Tandem Interconnection

The Commission made clear that BellSouth must provide interconnection at its local tandems without requiring a BFR. Order, p. 60. Previously, BellSouth had made inconsistent statements as to whether it would allow such interconnection. Please confirm that BellSouth will permit MCI to interconnect at BellSouth's local tandems, and please provide all information necessary to permit us to do so. Further, please confirm that, once MCI is interconnected at the BellSouth local tandem, MCI's traffic will travel on the same trunk groups as BellSouth's local traffic and that all existing independent telephone company local and EAS traffic routes served by the local tandem will be identified and made available to MCI traffic.

### 3. Unbundled Network Elements

The Commission required BellSouth to provide mechanized billing statements for usage sensitive UNEs in a CABS formatted billing statement. Order, pp. 76-77. Please begin providing UNE bills in a CABS format.

The Commission further required BellSouth to provide access usage detail to requesting carriers. Order, p. 77. As you know, this issue is already the subject of a pending action. In light of the Commission's order, however, we again request that BellSouth provide this information on a going-forward basis and provide the historical data that should have been provided on all UNEs from the time of installation.

### 4. Directory Assistance

The Florida Commission determined that BellSouth is not providing all directory listings to requesting carriers, specifically listings from other local exchange companies. Order, pp. 117, 119. Our agreement provides that "BellSouth shall provide to MCI, to the extent authorized, the residential, business and government subscriber records used by BellSouth to create and maintain its Directory Assistance Data Base, in a non-discriminatory manner." Interconnection Agreement, Attachment VIII, § 6.1.6.1. Under the Federal Act, BellSouth not only is authorized but is required to provide the directory listings it has for the customers of other telephone companies. MCI requests that BellSouth provide these listings as required by our agreement.

### 5. Reciprocal Compensation

In its discussion of the reciprocal compensation issue, the Commission acknowledged the dispute that has arisen concerning ISP traffic – that is whether MCI and other ALECs are entitled to compensation for traffic originating from BellSouth customers and routed to an ALEC's ISP customer. The Commission did not resolve this dispute, although it did express concern over the allegations that BellSouth failed to comply with contractual dispute resolution procedures.



For several months, BellSouth has been withholding funds that should have been paid to MCI in reciprocal compensation for the termination of local traffic. Please pay all amounts due by December 31, 1997 and confirm that BellSouth will pay all amounts due for reciprocal compensation (including amounts due for ISP traffic) in the future.

#### **6. Resale Services**

The Commission addressed the following resale issues, in addition to the OSS issues discussed above:

##### **A. Services not being provided on an a branded or unbranded basis to MCI**

The Commission noted that the Interconnection Agreement provides that BellSouth will brand all services at every point of customer contact exclusively as MCI services unless MCI requests that the services be unbranded. Order, pp. 171-72. Please confirm that BellSouth is prepared to provide voice mail, operator services and directory assistance on an MCI branded basis. In this connection, please note compliance with the agreement should not require the use of selective routing, because these calls already are routed to the BellSouth operator platform.

The branding or unbranding requirement of the Interconnection Agreement also applies to BellSouth's softdial product known as QuickService. As you know, this product permits a customer whose telephone line has been disconnected to call 911. If the customer dials any other three digits, QuickService provides a recording informing the customer that he or she should call BellSouth or another local service provider. This recording should be unbranded so that there is no reference to BellSouth.

BellSouth also is required to provide its 611 service on an unbranded basis as provided in our Interconnection Agreement, but to date has not done so. (See Attachment VIII, § 5.1.14.) MCI requests that BellSouth begin complying with this requirement.

##### **B. Parity in conversions**

The Commission ruled that BellSouth is not providing parity with respect to customer conversions. Order, p. 175. Please rectify this problem.





## 7. Performance Measurements

The Commission found that "BellSouth should provide performance measures that are clearly defined, permit comparison with BellSouth retail operations, and are sufficiently disaggregated to permit meaningful comparison." BellSouth was required to provide statistically valid commercial usage data showing:

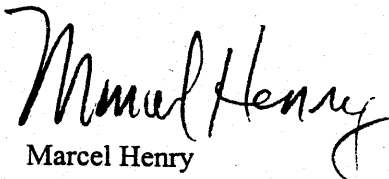
- A. average installation intervals for resale;
- B. average installation intervals for loops;
- C. comparative performance information for unbundled network elements;
- D. service order accuracy and percent flow through;
- E. held orders and provisioning accuracy;
- F. bill quality and accuracy; and
- G. repeat trouble reports for unbundled network elements.

Order, pp. 185-86.

The Commission also required BellSouth to "provide the necessary historical data to facilitate the establishment of initial benchmarks" that "should, at a minimum, address all of the functions listed in the LCUG." Order, p. 185. Please begin providing the performance measures and standards information required by the Commission. We request that BellSouth disaggregate this information in accordance with the LCUG Service Quality Measures report, including geographic disaggregation by state, city and wire center. In addition, we request that BellSouth provide the performance measures and standards information required by the Interconnection Agreement in a mutually agreed upon format.

We look forward to your response specifying how BellSouth plans to address these concerns, must be resolved in order for MCI to enter the local market in an effective manner.

Sincerely,

  
Marcel Henry

MLH/mle